Grove Learning Trust

Creating Remarkable Futures

Privacy Notice (Governance Roles)

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Version Control (GLT)

Version	Date	Status	Author (AU) / Approver (AP)
Draft 01	November 24	First draft (SchoolPro model)	SR (AU)
Final – A	Autumn 2024	Trustees (RAR) to approve	RAR (AP)
Draft 02	Autumn 2025	Moved to central model template. Contact email address changed to DPO@schoolpro.uk New legislation – link added to Data (Use and Access) Act 2025 Appendix A added to show updates following new legislation Revised complaint handling section to reflect Section 164A DPA 2018 (as amended by DUAA 2025). Individuals must now submit complaints directly to the organisation. Links to government publications have been updated in the section "How to Find Out What Personal Information the Department of Education (Dfe) Hold About You"	SR (AU)

Document Version Control Log (SchoolPro)

Version	Date	Description of changes and person/organisation responsible
2.0	30/04/2020	Text updated in 'Why We Collect and Use Workforce Information' to reflect Article 10 for processing criminal offence data and link to Data Protection Policy for conditions of processing in Schedule 1 of the Data Protection Act 2018.
2.1	26/02/2021	Text updated to reflect end of Brexit transition and updates references from the General Data Protection Regulation (GDPR) to the UK General Data Protection Regulation (UK GDPR). (SchoolPro TLC)
2.2	17/10/2022	Text updated in 'Requesting Access to Your Personal Data' to reflect new DfE wording regarding data subject rights. Bullet point list has been updated as well as introductory text to the list. (SchoolPro TLC)
2.3	11/08/2023	Text updated in 'How the Government Uses Your Data' to include some text minor changes. The changes are mostly to change references to the DfE to 'Department for Education (DfE)' in all cases and remove statistics on pupil data shares. (SchoolPro)
2.4	31/10/2025	Revised complaint handling section to reflect Section 164A DPA 2018 (as amended by DUAA 2025). Individuals must now submit complaints directly to the organisation.

		Links to government publications have been updated in the section "How to Find Out What Personal Information the Department of Education (Dfe) Hold About You"

Vision & Values

As one organisation, our vision for Grove Learning Trust is unapologetically bold. We are all about **creating remarkable futures.** For our children, our people, our places of work, we want the very best. We know that strong connections will enable us to achieve our vision, in a world where purposeful collaboration, based on mutual respect and trust, helps us to achieve more together.

Trust >> Connect >> Collaborate

Our policies underpin our vision and set out clearly our expectations of each other.

About this policy

This Privacy Notice for governance roles explains how and why we store personal information about those employed by the trust or otherwise engaged to work at the trust. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our trust is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR).

The Categories of Governance Information That We Process

- 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)

Why We Collect and Use Governance Information

The personal data collected is essential, in order for the school to fulfil their official functions and meet legal requirements.

We collect and use governance information, for the following purposes:

a) to meet the statutory duties placed upon us

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

- for the purpose **a)** named above in accordance with the legal basis of **Legal Obligation**

All maintained school governing bodies, under section 538 of the Education Act 1996 and academy trusts, under the Academy Trust Handbook have a legal duty to provide the governance information as detailed above.

In addition, concerning any special category data:

- conditions of GDPR - Article 9

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. Grove Learning Trust will work within the conditions of GDPR - Article 9 of the UK GDPR:

- (9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include volunteer dietary requirements, and health information we receive from our volunteers who require a reasonable adjustment to access our site and services.
- (9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
- (9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a volunteer in a medical emergency.
- (9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.
- (9.2g) reasons of substantial public interest. As a school, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.
- (9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4- archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.

We process criminal offence data under Article 10 of the UK GDPR.

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.

Collecting Governance Information

We collect personal information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during your governance role; from correspondence with you; or through interviews, meetings or other assessments.

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.

Storing Governance Information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit **www.grovelearningtrust.co.uk**

Who We Share Governance Information With

We routinely share this information with:

- the Department for Education (DfE)
- Companies House (role dependant)
- Suppliers and service providers with whom we have a contract.
- The DBS online service
- Referees

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 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 our governors with the Department for Education (DfE) under section 538 of the Education Act 1996 and under the requirements set out in the Academy Trust Handbook.

All data is entered manually on the GIAS system 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 'How Government uses your data' section.

Requesting Access To Your Personal Data

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 admin@grovelearningtrust.co.uk

Depending on the lawful basis used for processing data (as identified above), you may 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; or
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

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/

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 admin@grovelearingtrust.co.uk

Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.

If you wish to raise a concern about how we process your personal data, please contact us directly at **DPO@schoolpro.uk**. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: **Information Commissioner's Office**

Relevant Legislation

Data (Use and Access) Act 2025

Review

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 November 2024.

Contact

If you would like to discuss anything in this privacy notice, please contact: DPO@schoolpro.uk

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
- will 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
- allows 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 Department for Education (DfE) Hold About You

Under the terms of UK GDPR, 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'. See the guide for details:
https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

Further information on what personal information the Department for Education (DfE) holds about you is published in the privacy notice for education providers' workforce, including teachers. This is available below:
https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers

Appendix A - Updates from the Data (Use and Access) Act 2025

- New rights under Automated Decision-Making (ADM): Individuals have the right to be informed about ADM, challenge decisions, and request human intervention.
- Recognised Legitimate Interests: A new lawful basis for processing personal data in defined contexts, especially for SMEs and public bodies.
- Subject Access Requests (SARs): Introduction of 'reasonable and proportionate' search scope and a 'stop-the-clock' provision for complex requests.
- Enhanced Protections for Children's Data: Stronger requirements for consent and privacy notices in digital services involving children.
- Internal Complaints Handling Requirement: From June 2026, organisations must maintain a formal internal data protection complaints process with a 30-day response and 3-month resolution timeline.