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Purpose of this document

Aurora Academies Trust is a data controller for the purposes of UK data protection law.

This privacy notice explains how we collect, use, store and share personal information relating to those in governance roles (members, trustees, co-opted committee members, Local Academy Board [LAB] members).

Under the Data Protection Act 2018 and the UKGDPR, individuals have a right to be informed about how their personal data is used.

The categories of governance information we collect

We may collect, use, store and share the following categories of information:

- name, title and contact details;
- address and date of birth;
- governance role information;
- appointment and term information;
- committee memberships and attendance records;
- declarations of business and pecuniary interests;
- related party information;
- training and development records;
- governance correspondence and meeting participation records;
- complaints, disciplinary or conduct information where relevant;
- identity verification documents;
- DBS and safeguarding suitability information;
- Companies House personal codes;
- digital account and access information where school systems are used; and
- CCTV images where individuals attend school/trust premises.

Why we collect and use this information

We use governance information to:

- fulfil legal and regulatory obligations;
- support effective governance and oversight;
- maintain records of governance appointments and attendance;
- support safeguarding and wellbeing oversight;
- manage conflicts of interest and related party transactions;
- provide governance training and development;
- communicate regarding governance business;

- maintain the security of systems and premises; and
- comply with Department for Education and Charity Commission requirements.

Our lawful basis for using this information

We process governance information under the following lawful bases:

- Article 6(1)(c) UKGDPR – legal obligation;
- Article 6(1)(e) UKGDPR – public task;
- Article 6(1)(f) UKGDPR – legitimate interests, where applicable; and
- Article 9 UKGDPR conditions for special category data where required.

Where criminal offence information such as DBS data is processed, this is carried out in accordance with Schedule 1 of the Data Protection Act 2018.

Automated processing and digital systems

The trust may use digital governance systems and AI-assisted administrative tools to support governance administration, communication and record management.

Governance meetings or training activities may occasionally be recorded for administration, training or professional development, with appropriate notice, access controls and safeguards. Any significant decisions affecting individuals will involve appropriate human oversight.

Collecting governance information

Most governance information is provided directly by governance stakeholders, although some information may also be obtained from:

- the Department for Education;
- Disclosure and Barring Service checks;
- governance clerks;
- training providers; and
- regulatory or safeguarding bodies.

Storing governance information

We hold governance information securely in accordance with our retention schedule and records management procedures.

We use appropriate technical and organisational security measures to protect personal information.

Who we share governance information with

We may share governance information with:

- the Department for Education;
- local authorities;
- the Charity Commission;
- Companies House
- safeguarding agencies;
- auditors, insurers and legal advisers;
- governance support providers;
- IT and cloud service providers acting on our behalf; and
- regulators and law enforcement bodies where required.

Some governance information may be published where required by law or guidance, including on the school/trust website or Get Information About Schools (GIAS).

International transfers

Some service providers may process information outside the United Kingdom. Where this occurs, appropriate safeguards will be implemented in accordance with UK data protection law.

Your rights

Under data protection law, you have rights including:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure in certain circumstances;
- the right to restrict processing;
- the right to object to processing; and
- rights relating to automated decision-making.

Requests should be directed to the trust's Governance Manager.

Concerns and complaints

If you have a concern about the way we are collecting or using your personal information, you have the right to make a complaint to us. Any complaints relating to data protection must be directed to our Data Protection Officer by emailing dpo@dataprotection.education. Data protection complaints will be dealt with in accordance with the procedure set out in our Data Protection Complaints Policy.

If you remain dissatisfied with the response, you can make a complaint directly to the Information

Commission here: <https://ico.org.uk/make-a-complaint/data-protection-complaints/> .

Contact

If you would like to discuss anything in this privacy notice, please contact:

Aurora Academies Trust: office@auroraacademies.org

Data Protection Officer: Data Protection Education

Telephone: 0800 0862018

Email: dpo@dataprotection.education

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