



**PRIVACY NOTICE: RLT Governance**

**ADOPTED: Spring Term 2026**

**REVIEW PERIOD: Annually**

**REVIEWER: Data Protection Officer**

## 1. Introduction

The Rowan Learning Trust collects, holds, uses and shares information about those involved with the governance of the Trust and its schools, including governors, trustees & members.

Much of the information we collect is classed as 'personal data' and our use of it is covered by a set of rules called the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025. For the purposes of Data Protection legislation the Rowan Learning Trust is a data controller and is registered as such with the Information Commissioner's Office.

You have rights around the data collected, including knowing how and why we are processing the data. "Processing" data means everything from collecting, to storing, using, sharing and disposing of it.

This document tells you more about:

- The information we collect;
- What we use the information for;
- How your information is stored and how long we keep it;
- What rights you have to the information.

## 2. What Information do we collect and use about volunteers?

We collect, use, store and share (when appropriate) a variety of information about you which includes, but is not limited to:

- Personal details – such as title, full name;
- Current & previous contact details;
- Evidence of qualifications, where applicable;
- Employment details, where applicable;
- Information about business and pecuniary interests;
- Signed declarations of eligibility and code of conduct;
- Information provided by you as part of an application form to facilitate the appointment procedures including any references that may have been requested;
- Current & previous governance positions – type of role appointed to, any positions held on the relevant boards/sub-committees and terms of office; reasons for suspension/resignation;
- Attendance information – such as meetings attended, apologies for absence;
- Records of communications – such as emails you have sent and received;
- Information about your use of Trust/school IT devices and networks.

We also are required to collect and use information that is given additional protection under the GDPR – **special category data**, including:

- Characteristics information - such as gender, age, ethnicity;
- Information about medical or health conditions, including whether you have a disability for which we need to make reasonable adjustments;
- Photographs of you or images on CCTV\*;

- Demographic information required for monitoring equal opportunities – such as ethnicity, sexual orientation, health and religion or belief;
- Information about criminal convictions, offences and prohibitions where this is necessary for compliance with our other legal and regulatory obligations.

This information may have come from other organisations including other schools, employers, social care, and the Disclosure & Barring Service.

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your involvement with the Trust/school.

Whilst the majority of information we collect is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional.

In addition:

- Schools also use CCTV cameras around their site(s) for security purposes and for the protection of staff, learners and visitors. CCTV footage may be referred to during the course of disciplinary procedures (for staff or learners) or to investigate other issues.
- The school may record external telephone calls for training and monitoring purposes. Personal data referred to within such a call recording may be transcribed and/or referred to when supporting student learning, when supporting students' health/welfare (including their vital interests) or when resolving other issues.

### **3. Why we collect and use this information.**

Under the DUAA, the Trust must demonstrate that the purposes for which governance information is collected are proportionate, necessary, and formally documented. These transparency and accountability requirements form part of our public-sector obligations.

We use the information to:

- Establish & maintain effective governance as required by our Articles of Association, our funding agreements and the Academy Trust Handbook
- Meet our statutory duties, including our legal obligations to process information – such as populating the National Governor database and the GIAS (Getting Information about Schools);
- Facilitate safer recruitment (e.g. by carrying out criminal records checks and requesting references) as part of our obligations to safeguard children;
- For health and safety including site security and safety;
- Undertake equalities monitoring;
- Ensure appropriate access arrangements can be provided for volunteers who require them;
- Ensure our information and communications systems, equipment and facilities are used appropriately, legally and safely;
- Enable photographic images to be used for identification purposes (safeguarding), and celebration purposes (school events);

- Keeping records about governance decision-making processes, including copies of minutes, reports and other documentation;
- Keeping records of governance committee/sub-committee and/or any panels, we may process your name, opinions, comments and decisions attributed to you – such as if you sit on a panel for considering complaints, exclusions or HR issues;
- Protect public monies against fraud, including detecting/preventing crime and combating potential fraud;
- Respond to investigations/enquiries from our regulators or to respond to complaints raised by our stakeholders;
- Maintain our governance database;
- Circulate information to enable governors, trustees and members to undertake their role and function/responsibilities;
- Receive advice from external advisors and consultants e.g. external reviews of governance;
- Deliver advice, information and training, as well as plan future training needs.

#### **4. The legal basis for using this information**

The personal data collected is essential in order for the Trust and its schools to fulfil their official functions and meet legal obligations as outlined in Section 3. Under the Data (Use and Access) Act 2025, we may process personal data where it is necessary for pre-approved public-interest purposes, including safeguarding, preventing or detecting crime, and regulatory compliance. This lawful basis does not require the traditional balancing test but still requires proportionate and transparent processing.

Processing is necessary for:

- Compliance with a legal obligation [Article 6(1)(c)];
- Performing a task carried out in the public interest [Article 6(1)(e)];
- Legitimate interests [Article 6(1)(f)]

The ways we collect and use special category information are lawful based on:

- Explicit consent;
- For compliance with certain legal obligations;
- For exercising certain legal rights;
- For protecting a person's vital interests in an emergency;
- For health and public health reasons;
- For carrying out tasks that are in the substantial public interest including for safeguarding purposes.

Where we use special category data, we process this under exemptions from Section 9 of GDPR.

Biometric Systems – where a school operates a biometric system for identification (where used, these are usually fingerprint-based systems found in catering/library applications but can include door entry and other systems) then the school will require explicit written consent from each intended user.

Marketing purposes - Where a governor, trustee or member gives us consent, we may send them marketing information by text message or email, such as promoting school events, campaigns or charities. **Consent can be withdrawn at any time by contacting us (see the Contacts section)**

Automated decision making & profiling - We do **not** use any personal information to make automated decisions about our learners or their families, or to profile them. If automated or algorithmic systems affecting governance roles are introduced in future, we will update this notice to explain the decision-making logic and your right to request **human review**, in accordance with DUAA requirements.

## 5. Collecting this information

We collect this information in a variety of ways, including but not limited to:

- any forms you complete for us including application form, declarations of eligibility as well as pecuniary/business interest;
- your passport or other identity documents such as your driving license;
- correspondence and interviews/meetings or other assessments with you;
- our CCTV systems;
- the Department for Education (Section 128);
- the DBS Service and where necessary, the Teaching Regulation Agency;
- the police, courts or tribunals;
- the local authority;
- references prior to your role commencing;
- social media checks (in line with KCSIE guidance).

Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. We will inform you at the point of collection, whether you are required to provide certain information to us and your rights in relation to this.

## 6. Storing your personal data

Some of the personal data that we collect and use/process is stored in the Trust's Microsoft 365 account. This is a cloud-based platform with personal data being held on Microsoft servers based within the EU. Other data, depending on why we use it will be kept on other systems (see Section 8) or in paper files which are held in secure storage. We also use email to enable authorised users to transfer information to one another. These emails are always encrypted.

Most of the personal data that we collect and use is added to your personnel file. Other data, depending on its purpose, will be kept in other systems or in manual files. We use email to enable authorised users to transfer information to one another.

We dispose of all personal information securely when we no longer need it.

If you would like to know how long we keep a specific piece of personal data, please contact the Data Protection Lead whose details can be found at the end of this Privacy Notice.

## 7. Requesting access to your personal data and other rights

Right of Access - you have the right to access/view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries who do not fall under the requirements of the GDPR. Some information we hold cannot be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you.

To have access to your personal data we will need to collect details of what you want and in the first instance you can contact the Data Protection Lead whose details can be found at the end of this Privacy Notice.

### Subject Access Requests under the DUAA

When responding to a SAR, we will conduct only **reasonable and proportionate** searches, as required by the Data (Use and Access) Act 2025.

We may **pause the statutory response timeframe** if we require further information to verify identity or clarify the scope of your request, and you will be notified if this occurs.

You also have the right to:

- **be informed** about the collection and use of your personal data;
- **correction** - have inaccurate personal data corrected/rectified, or completed if it is incomplete;
- **be forgotten** - have your data erased, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation;
- **restriction** - limit the way we are using your information, although, as above this is a limited right;
- **objection** - object to the way we are using your information; though other than for marketing purposes, this is also limited as above.

Other Rights you have

You also have rights in relation to automated decision making and profiling, though these are not currently relevant as we do not carry out automated decision making or profiling.

Right to withdraw consent - where we rely on your consent to collect and use personal data, you have the right to withdraw that consent. This applies if you change your mind, or you are unhappy with our use of your personal data. **Withdrawing your consent will need to be recorded in writing, please contact the Data Protection Lead at school.** Once we receive this, we will stop using your data.

**Right to complain** - Data Protection Complaints Process (mandatory under DUAA 2025) (Updated for DUAA 2025)

Before raising a concern with the ICO, the DUAA 2025 requires that you first use the Trust's internal data-protection complaints procedure. To make a complaint:

- contact the Data Protection Lead in the first instance;
- if unresolved, the matter will be considered under the Trust's internal data-protection complaints procedure;
- you may then escalate to the ICO once the internal process is complete.

## 8. Sharing your personal data

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent. In some instances, we may be required to include special category data in the information we provide. The DUAA places additional emphasis on accountability for public-sector data governance. The Trust maintains documented records of processing, conducts data-protection training for relevant staff, and ensures data-sharing decisions are transparent and auditable.

Examples of people we share personal data with are:

- Local Authority (LA) (to meet our legal obligations to share certain information with it, such as safeguarding concerns);
- Our Local Governing Committees (LGC) and/or Trust Board and sub-committees;
- Other academies within the Trust;
- The Trust's auditors;
- The Department for Education, including where necessary the Teaching Regulation Authority;
- The Disclosure and Barring Service (DBS);
- Appropriate regulators – such as Ofsted, Regional Directors, Companies House;
- Police, Courts and/or Tribunals;
- Other authorities/agencies for safeguarding purposes;
- Our suppliers and service providers used by school (and our Trust) to carry out day-to-day processes and requirements. For example, but not limited to:
  - Arbor – our MIS system;
  - Microsoft 365 and TEAMS – our workspace including emails;
  - Online SCR – used to manage our single central record;
  - Social media platforms such as X, Instagram and Facebook.

Where we share your personal data with someone who is a supplier or service provider, we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

### 8.1 International Transfers

Where personal information is transferred outside the UK or EEA, we apply the DUAA "data protection test", ensuring that the level of protection in the destination country is **not materially lower** than that in the UK. Appropriate safeguards (including International Data Transfer Agreements) are used where required. Personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers please contact us to speak to our Data Protection Officer.

## **8.2 Freedom of Information Act and environmental Information Regulations 2004**

As a public body, both TTAPA and our Trust are subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws. For example, we may receive a request asking about numbers of governors who work for the trust.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

### **9. Why we regularly share school workforce information**

We do not share information about our volunteers with anyone without consent unless the law and our policies allow us to do so.

### **10. How Government use your information**

We share personal data with the Department for Education (DfE) on a statutory basis. We are required to share information about our governors, trustees and member under Section 538 of the Education Act 1996 and amendments.

All data is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework [Security policy framework - GOV.UK](#).

For more information about the Department's data sharing process, please visit: [How DfE shares personal data - GOV.UK](#)

#### **10.1. Data collection requirements**

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to: [Data collection and censuses for schools - GOV.UK](#)

#### **10.2 Sharing by the Department**

The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis;
- Producing statistics;
- Providing information, advice or guidance.

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use.

Decisions on whether the DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data;
- The purpose for which it is required;
- The level and sensitivity of data requested; and
- The arrangements in place to securely store and handle the data.

To be granted access to school information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

If you need more information about how the DfE collects and uses your information, please visit: [How DfE shares personal data - GOV.UK](https://www.gov.uk/government/policies/privacy-notices/department-for-education-privacy-notices)

### 10.3 How to find out what personal information the DfE hold about you.

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- 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, you should make a 'subject access request'.

Further information on how to do this can be found within the Department's personal information charter that is published at the address below: [Personal information charter - Department for Education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/privacy-notices/department-for-education-privacy-notices)

To contact the DfE please visit: [Contact the Department for Education \(DfE\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/privacy-notices/department-for-education-privacy-notices)

## 11. Updates to this privacy notice

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was approved in November 2024. This notice will be updated in accordance with further ICO guidance on the DUAA, expected across 2026.

## 12. Who to contact

The school and Trust have the responsibility to ensure that your personal data is protected: they are called the data controller. All members of staff work for the data controller.

If you have a concern about the way we are collecting or using your personal data, or you have any questions about this privacy notice, we request that you raise your concern with the school in the first instance.

We recommend that you contact the data protection lead (DPL):

Name of Person: Ellen Palmer  
Email address: [e.palmer@hhhs.net](mailto:e.palmer@hhhs.net)  
Contact number: 01942 204640  
Address: Carr Lane, Wigan, WN3 5NY

If you are not satisfied with their response, please contact Trust's Data Protection Administrator:

Name of Person: Chris Bolton  
Email address: [dpo@rlt.education](mailto:dpo@rlt.education)

Contact number: 01942 939022  
Address: 18 Beecham Court, Wigan, WN3 6PR

Trusts are also required to have someone called a Data Protection Officer or DPO. The DPO advises the Trust about issues to do with data protection, but can also help you, if you have a problem.

Our Data Protection Officer is:

Name of DPO: GDPR Sentry Limited  
Email address: [support@gdprsentry.com](mailto:support@gdprsentry.com)  
Contact number: 0113 804 2035  
Address: Unit 434 Birch Park, Thorp Arch Estate, Wetherby, West Yorkshire, LS23 7FG

If you are dissatisfied with our response to your concerns, you can contact the ICO (contact details below) quoting our ICO registration number **Z3180736** and stating that the Data Controller is The Rowan Learning Trust.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 if you prefer to use a national rate number

Website: <https://ico.org.uk/concerns/>