SOUTH DOWNS
LEARNING TRUST

Privacy Notice - Governors, Trustees and Volunteers

Date approved	November 2025
Date of next Review	September 2026
Status	Mandatory
Lead Author	Mark Hatton (based on ESCC model)

Privacy notice will also be updated in line with UK GDPR changes

All our policies support our vision and are based on our core virtues

Compassion – Respect – Creativity – Teamwork – Effort - Responsibility

Developing caring, confident and creative students who achieve excellence

Privacy Notice (How we use governors', trustees' and volunteers' information)

Under data protection law, individuals have a right to be informed about how South Downs Learning Trust (SDLT, or 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 about individuals working in a voluntary capacity for SDLT, including governors and trustees.

The categories of information that we collect, process, hold and share on governors, trustees and volunteers include:

We process the following personal data relating to those who hold a governing role, or otherwise engage in voluntary work at, our schools.

- Personal information (such as name, date of birth, contact details and postcode) given on application forms
- Governance details (such as role, start and end dates and governor ID)
- References
- Documents to support an Enhanced Disclosure and Barring Service application, such as copies of Passports, Bank statements, Birth and Marriage Certificates
- Evidence of academic qualifications
- Employment details
- Information about business and pecuniary interests
- Photographs and images captured on onsite CCTV
- Data about your use of or access to the school's information and communication systems.
- Special categories of data including characteristics information such as ethnic group, disability/access requirements or other medical information

Why we collect and use this information

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

We collect and use volunteer, trustee and governor information, for the following purposes:

- Establish and maintain effective school governance
- Meet statutory obligations for publishing and sharing [governors'/trustees'] details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Identify you and safely evacuate the school in the event of an emergency
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers/governors who require them
- Preserve the school's history and collective memory

The lawful basis on which we use this information

Under current data protection legislation, SDLT must dentify a valid, lawful basis for any

data processing they carry out. We process personal data in relation to staff using the following lawful bases:

UK GDPR Article 6 (1)

- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- The data subject has given consent to the processing of his or her personal data
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

UK GDPR Article 9 (2)

- Processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment
- Processing is necessary for the purpose of preventative or occupational medicine or for the assessment of the working capacity of the employee.
- Processing is necessary for reasons of substantial public interest.
- The data subject has given explicit consent to the processing of their personal data.
- We are required to for reasons of "public health", for example during a pandemic

Please see the Special Category Data policy for more information about how we process this type of data. This policy can be found on our website: Key Information - South Downs Learning Trust (sdlt.org.uk)

Where we keep records and information containing personal data for a longer time, we do this for archiving purposes in the public interest. We keep these records to preserve the school's history, key events and collective memory. We will provide access to these records for research or statistical purposes, taking reasonable measures to protect the personal data they may contain.

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.

Collecting governor, trustee and volunteer information

We collect personal information via application, contact and consent form and related party transaction form.

Governor data is essential for the 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 governor, trustee and volunteer information

We hold volunteer, trustee and governor data securely for 6 years. This data is stored securely in line with our records management policy and is only used for purposes directly relevant to your voluntary role with the trust.

When your relationship with the trust has ended, we will retain and then securely dispose of your personal information in accordance with our Records Management Policy.
A copy of this policy is available on the trust website at- Key Information - South Downs Learning Trust (sdlt.org.uk)

We will keep a limited and reasonable amount of personal information for a longer time, where it appears in records that are of historic value or it is in the public interest to keep as part of the school's history and collective memory. We store these records securely in the school archive for permanent preservation.

Who we share governor, trustee and volunteer information with

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, such as safeguarding concerns.
- The Department for Education (DfE)
- Ofsted
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor clerk.
- traded services purchased through the LA (e.g. for Legal, Human Resources or Information Governance Support)
- South Downs Learning Trust members

Why we share governor, trustee and volunteer information

We do not share information about our governors or volunteers 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)

We are required to share information about our governors with the (DfE) under the requirements set out in the Academy Trust 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.

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

DPO@SDLT.org.uk

You also have the right to:

- ask us for access to information about you that we hold
- be informed about the collection and use of your personal data – this is called the 'right to be informed'
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- object to processing of personal data in certain circumstances
- prevent processing for the purpose of direct marketing
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. 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 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 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 our Data Protection Officer (DPO@SDLT.org.uk).

Data Protection Officer

Peter Questier (East Sussex County Council, Information Governance Team. Children's Services)

However, please contact the trust in the first instance if you have a query regarding this privacy notice or how your information is used, by emailing: DPO@SDLT.org.uk

How Government uses your data

The governor data that we lawfully share with the DfE via GIAS:

- will increase the transparency of governance arrangements links to school funding and expenditure

- will enable schools and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allows the department 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 including the data that we share with them, go to https://www.gov.uk/government/news/national-database-of-governors

Note: 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 DfE hold about you

Under the terms of the Data Protection Act 2018, you're 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'. 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 below:

https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers

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

Last updated

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 on October 2025.