



PRIVACY NOTICE FOR MEMBERS, TRUSTEES & GOVERNORS

THIS NOTICE APPLIES TO THE HEARTWOOD LEARNING TRUST (HLT)
MEMBERS, TRUSTEES AND GOVERNORS

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Policy Updates

Date	Page	Policy Updates
June 2025	Whole document	Re-formatting and re-write to ensure the privacy notice is compliant with data protection legislation and reflective of the Trust's vision and values

Introduction

Heartwood Learning Trust is an inclusive and collaborative Church of England multi-academy trust serving church, community and alternative provision schools. This policy is guided by our Christian ethos and the visions of our Trust and its schools/academies. We share a clear vision – to create schools where children and young people thrive, as we help them prepare to live life in all its fullness (John 10:10).

For us, a place to thrive means much more than a place simply to be comfortable. Instead, our aim is to develop schools and an educational offer which enable each pupil to flourish academically, practically, emotionally, socially and spiritually.

Privacy Notice

Heartwood Learning Trust are the data controllers for Members', Trustees' and Governors' personal data as defined by the UK GDPR. This means that the Trust will determine the purposes for which your personal data is processed and the manner of the processing. We will only collect and use your personal data in ways that are compliant with applicable data protection legislation.

The Trust has a duty to ensure that Data Subjects (Members, Trustees and Governors) are informed about how we process the personal data that is in our control.

1. What categories of personal data do we process?

The categories of personal data that we process include the following:

- **Personal identifiers** (e.g. name, title, former names, occupation, date of birth, address, telephone number, email address and National Insurance Number)
- **Professional Development Records** (e.g. details of skills audits, training records and qualifications)
- **Recruitment information** (e.g. application forms, references, identification, birth certificate and proof of address)
- **Governance information** (e.g. role, start date, end date, attendance, areas of responsibility, pecuniary and business interests, ethos undertaking, minutes, and governor ID)
- **Photographs** (e.g. headshots for ID badges/lanyards)
- **Financial information** (e.g. expense claim forms for mileage, where applicable)
- **Equality monitoring information** (e.g. ethnicity, religious belief, gender)
- **IT usage data** (e.g. monitoring use of the Trust's network and IT systems, records of communication)

Please note this list is not exhaustive.

2. Why do we process your personal data?

In order for the Trust to fulfil its official functions and meet legal requirements, we need to process some of your personal data.

We collect and use your personal data for the following purposes:

- To meet the statutory duties placed upon the Trust
- To fulfil essential recruitment checks to ensure the safeguarding of our pupils and other stakeholders
- To fulfil the requirements of Companies House, Get Information About Schools (GIAS) and the Academy Trust Handbook
- To enable the Trust/school/academy and the Governance Service to communicate with Members, Trustees and Governors - to support them in their role
- To ensure your right to work and assess your suitability for the role during the recruitment process
- To pay expenses claims, where appropriate
- To meet our health and safety obligations and make any adjustments you may need
- To monitor professional development to ensure those responsible for Governance of the Trust are suitably trained
- Support the monitoring of equality, diversity and inclusion (EDI) practices across the Trust

3. What is our lawful basis for processing your personal data?

Under the UK General Data Protection Regulation (UK GDPR), the we would typically rely on the following lawful bases for processing personal information for general purposes:

- Article 6(1)(c) - legal obligation (for the purpose of meeting the statutory duties placed upon the Trust/school/academy)
- Article 6(1)(e) - public task

Some of the information about you is classed as special category data (more sensitive information which requires a higher level of protection). For the purposes of processing special category data, we rely on the following conditions under Article 9 of the UK GDPR:

- Article 9(2)(b) - employment and social security and social protection law
- Article 9(2)(g) - reasons of substantial public interest

The applicable substantial public interest conditions in Schedule 1 of the Data Protection Act 2018 are:

- Condition 6 - statutory and government purposes
- Condition 8 – equality of opportunity or treatment
- Condition 10 - preventing or detecting unlawful acts
- Condition 18 - safeguarding of children and vulnerable people

4. How do we collect your personal information?

We normally receive information directly from you, however we also collect data via third parties, as appropriate.

Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with the 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 to 'opt in' or to 'opt out'.

Data we collect from you directly:

- Application forms
- Diocesan recommendations and appointment correspondence
- Parent/carers and staff Governor election nomination forms
- Personal development records (certificates, qualifications and training records)
- Record of Business Interest forms
- Records of email communications between you and the Trust
- Referee contact details

We also collect data from third parties:

- The Disclosure and Barring Service (DBS)
- The Teaching Regulation Agency, where applicable
- Referees providing details of your suitability for the role
- Local Authority
- The Trusts appointed Governance service (currently City of York Council)
- The National College
- National Governance Association (NGA)

5. How do we store your information?

The majority of personal data is stored via the Trust's Google Drive (securely hosted in UK data centres). Physical documentation will be stored by our HR team or associated school/academy HR Link, in a secure storage area with restricted access.

Statutory safeguarding checks carried out before commencement of your role are held within our online Single Central Record provision/service

Personal data linked to the governance role, such as minutes and agendas are retained via our designated governance portal. The Trust has completed Data Protection Impact Assessments (DPIAs) to ensure that these systems are secure and your personal data is protected.

6. How long do we keep your personal data for?

We will only keep your personal data for as long as is required for us to meet our statutory obligations. Any personal data which we are not required by law to retain will only be kept for as long as is reasonably necessary to fulfil the purpose for which it was collected.

Your personal data is retained in line with the Trust's [Data Protection \(UK GDPR\) Policy](#) and the accompanying Data Retention Schedule, which is reviewed in line with applicable data protection legislation.

What happens when my term of office ends, or if I resign?

When an individual is no longer involved in a governance role, their details are removed from our internal databases, the DfE's Get Information About Schools (GIAS) website and the online governance portal (used internally to manage governance paperwork and meetings).

There is a statutory requirement to publish on our websites, details of any Members, Trustees or Governors who have stood down within the previous 12 months. In order to comply with financial regulations, Business Interest forms will be retained for six years following cessation of the individual's role.

Additional information must be retained for historical and archiving purposes, such as summary registers which must be retained indefinitely.

7. Who do we share your information with, and why?

We routinely share your information with:

- **Online SCR** (single central record) - to ensure HR compliance
- **Disclosure and Barring Service (DBS)** - to carry out essential safeguarding checks
- **The National College** - to enable user access to their training courses in order to fulfil the governance role
- **National Governance Association (NGA)** - to enable user access to their resources in order to fulfil the governance role
- **DfE, Get Information About Schools (GIAS)***

- **Companies House** (via the Trust's legal representative) - in order to fulfil statutory reporting obligations, where applicable
- The Trust's external **IT partner** - to provide access to login information and provide technical support
- **External Auditors****
- **Internal Auditors****
- The Trusts appointed **Governance service** (currently City of York Council)***

Department for Education

*The personal data that we lawfully share with the DfE via GIAS increases the transparency of governance arrangements and enables the DfE to uniquely identify individuals who are involved in governance. You can find out more about the requirements placed on the Trust by the DfE, including the data we share with them, via this website: <https://www.gov.uk/government/news/national-database-of-governors>.

Access is restricted to authorised DfE and education establishment users with a DfE Sign-in account who need to see it to fulfil their official duties. The information is for internal purposes only and is not shared beyond the DfE, unless the law permits.

Auditors

**Members, Trustees and Governors complete an annual Business Interest form, in order to comply with statutory requirements and the requirements of the Academy Trust Handbook. Our Auditors may request to see these forms. Some of your details may be shared to enable them to carry out their work in overseeing governance reviews of the Trust.

The Governance Service

***The Trust has a Service Level Agreement with the Governance Service (provided by City of York Council). The Governance Service supports the Trust with all aspects of governance, at all levels and locations within the Trust. The Governance Service operates under its own separate Privacy Notice, which is available [here](#).

8. What are your rights regarding your personal data?

Under the UK GDPR, you have the following rights in relation to the processing of your personal data:

- To be **informed** about how we process your personal data (e.g. by providing you with a copy of this privacy notice)
- To request **access** to or a copy of the personal data we hold about you*
- To **data portability** (the right to obtain and reuse your personal data for your own purposes)
- To request that your personal data is **rectified** (amended) if inaccurate or incomplete
- To request that your personal data is **erased** where there is no compelling reason for its continued processing
- To request that the processing of your personal data is **restricted** (e.g. consenting to it being stored but restricting it being processed any further)
- To **object** to your personal data being processed (e.g. where this is being used for marketing or research purposes)
- To **object to automated processing** or decision making regarding your personal data

*To submit a request for access to copies of the personal data we hold about you, please email dpo@hlt.academy. Requests will be processed in accordance with our [Subject Access Request Policy](#).

How to withdraw consent

Where the Trust or school/academy processes data on the basis of consent, you have the right to withdraw your consent at any time. To withdraw your consent, you can contact the **Data Protection Officer (DPO)** via the below contact details to express your right to withdraw. You are not required to provide a reason for withdrawing consent.

9. How can you find out more information?

The Trust has appointed the **Chief Operating Officer** as its **Data Protection Officer**. The role of the **DPO** is to monitor our compliance with the UK GDPR and Data Protection Act 2018 and advise on data protection issues.

If you would like to discuss anything in this privacy notice or our use of your data, please contact the Trust's **DPO** via email: dpo@hlt.academy or telephone: 01904 560053. Alternatively you can write to us at: FAO Data Protection Officer (DPO), Heartwood Learning Trust, Rawcliffe Drive, York, YO30 6ZS.

If you require further information about how the DfE processes your personal data, please contact the DfE directly via their [website](#).

10. How can you raise a concern?

If you are concerned about the way we are collecting or using your personal data, please raise your concern(s) with the Trust's **DPO** in the first instance.

If you would like to lodge a formal complaint, please follow the Trust's [Complaints Policy and Procedure](#) available on our website.

If you are unhappy about the way your concerns have been dealt with, or do not believe the Trust is adhering to data protection principles regarding your personal data, you can seek advice from the **Information Commissioner's Office (ICO)** via: <https://ico.org.uk/concerns/>.

11. Monitoring and Review

The Trust reserves the right to amend this privacy notice at any time. We will notify you of meaningful changes to the way we process your personal data (anything that will affect you). However, we would recommend that you revisit this privacy notice periodically to ensure you maintain a copy of the latest version.

Newly appointed Members, Trustees and Governors will be made aware of this Privacy Notice as part of their induction. This privacy notice is also available on our website for anyone to view as required (<https://hlt.academy/key-information/policies>).

The Trust's **Deputy DPO** will periodically review this privacy notice to ensure it is accurate and remains compliant with current legislation and legal requirements placed upon the Trust. The Trust's **Deputy DPO** will update this privacy notice if we change how we collect and process your data.

This privacy notice will be reviewed every two years and approved by the **Chief Operating Officer**. The next scheduled review of this privacy notice can be found on the cover page of this document.