

Privacy Notice (How We Use Trustee and Governance Information)

This Privacy Notice has been adopted by all schools within The Golden Thread Alliance – Culverstone Primary School, Fleetdown Primary Academy, Meopham Community Academy, Oakfield Primary Academy, The Riverview Academy, Temple Hill Primary Academy, West Hill Primary Academy and Wrotham Road Primary School.

The Categories of Trustee and Governance Information That We Process Include:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details, marital status and postcode)
- Trustees and Governance details (such as role, start and end dates and governor ID)
- Emergency contact information such as names, relationship, phone numbers and email addresses
- Information about business and pecuniary interests
- Information acquired as part of your application to become a Trustee or Governor
- Criminal records information as required by law to enable you to work with children
- Photographs
- Images captured by school's CCTV system
- Video recordings captured by school's video conferencing platform
- Electronic signatures to sign off minutes

Why We Collect and Use Governance Information

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

We collect and use Trustees and Governance information, for the following purposes:

- a) to meet the statutory duties placed upon us
- b) Transparency and accountability
- c) Communication and coordination
- d) Risk Management

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

- a) named above in accordance with the legal basis of **Legal Obligation**
- b) named above in accordance with the legal basis of **Legal Obligation**
- c) named above in accordance with the legal basis of **Legitimate Interests**
- d) named above in accordance with the legal basis of **Legal Obligation and Legitimate Interests**

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

In addition, concerning any special category data:

- Medical and Allergen information for Members, Trustees and Governors to ensure risk assessments are completed, as appropriate
- Nationality of Trustees for registering with Companies House

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 Trustee and Governance Information

We collect personal information from you directly, or from a number of third-party sources, such as other employees, the DBS and technical networks.

Trustee and Governance data is essential for the Trust and each 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 Trustee and 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 find our Data Retention Policy on the Trust's website.

Who We Share Trustee and Governance Information With

We routinely share this information with:

- the Department for Education (DfE)
- Government departments or agencies
- Suppliers and Service providers
- Professional advisors and consultants
- Law enforcement
- Support services
- DBS
- Other schools within the Trust
- Companies House
- National Governance Association (NGA)
- Parents and colleagues

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

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 individuals in governance roles with the (DfE) under the requirements set out in the [Academies Financial Handbook](#)

Companies House

We are required to share Trustee data with Companies House under company/charity law.

Government department or agencies

We may share information with Government departments or agencies to ensure that the Trust complies with relevant laws and regulations. Many government grant and funding opportunities require detailed governance information. Therefore, sharing this data helps to secure necessary funding and demonstrating that the Trust meets the criteria for financial support. Government agencies may also use governance data to inform policy development and conduct research.

Suppliers and Service Providers

We may share information with suppliers and service providers to enable them to deliver their services effectively.

Professional Advisors and Consultants

We may share information to professional advisors and consultants to enable them to provide expert guidance on various aspects, including legal, financial and strategic matters. Sharing the data ensures they have the necessary information to offer accurate and relevant advice. Consultants often assist with strategic planning and decision-making processes and therefore access to Trustee and Governance data allows them to understand the Trust and schools structure, goals and challenges, enabling them to provide tailored recommendations.

Law Enforcement

There are legal obligations that require the Trust to share certain information with law enforcement agencies. This ensures that the Trust complies with laws and regulations related to crime prevention and investigation.

Support Services

We may share information with support services to ensure that they have the necessary information to offer targets and effective support.

DBS

The primary purpose of the DBS is to help employers make safer recruitment decisions and prevent unsuitable individuals from working with vulnerable groups, including children. Sharing Trustee and Governance data ensure that all Trustees and Governors undergo the necessary background checks to maintain a safe environment.

Other schools within the Trust

We may share data with other schools within the Trust to ensure that there are consistent practices and standards. Data sharing allows for more efficient use of resources across the Trust, meaning that schools can collaborate on initiative, share best practice and avoid duplication of efforts. There is also a legal obligation to share data with the Trust to ensure transparency, accountability and adherence to educational standards.

National Governance Association (NGA)

The NGA provides valuable support and guidance on governance issues. Sharing data ensure that the Trust can benefit from expert advice and resources to improve governance practices. The NGA also offers training and development opportunities for Trustees and Governors. Access to governance data helps tailor these programs to the specific needs of the Trust, enhancing the skills and effectiveness of its Trustees and Governors.

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.

Parents and Colleagues

We may share names with parents and colleagues when Governors are convening panels for complaints or disciplinary.

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 Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

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 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 Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

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 in October 2025.

Contact

If you would like to discuss anything in this privacy notice, please contact: Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

How Government Uses Your Data

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

- will increase the transparency of governance arrangements
- will enable maintained schools and academy trusts 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 publically available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff 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, 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'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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