

GDPR Data Protection Privacy Notice for Governors, Directors and Members

This privacy notice explains how Isle Education Trust (“IET”, “we”, “us”) collects, uses, stores and protects personal data relating to current and former Governors, Directors and Members (“you”), in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It is provided to meet our transparency obligations under Articles 12–14 UK GDPR.

Data Protection Principles

When processing personal data, we will:

- process it lawfully, fairly and transparently
- collect it for specified, explicit and legitimate purposes
- ensure it is accurate and kept up to date
- retain it only for as long as necessary
- keep it secure

Data Controller

Isle Education Trust is the **data controller**. This means we determine the purposes and means of processing personal data.

Data Protection Officer (DPO)

“The Data Protection Officer (DPO) for Isle Education Trust is the Chief Finance & Operating Officer who can be contacted at GDPR@isleeducationtrust-iet.co.uk

Definitions

“Personal data” means any information relating to an identified or identifiable individual.

“Special category data” means personal data requiring additional protection, such as data relating to health, ethnicity or political opinions.

Scope

This privacy notice applies to all current and former Governors, Directors and Members of Isle Education Trust, including those appointed to local governing bodies and Trust-level governance roles.

Personal data we collect

Categories of data

We may collect, store and use the following:

Identity and contact information

- Name, title and contact details
- Date of birth
- Photograph

Governance and eligibility records

- Appointment and start/end dates of term of office
- Attendance at meetings
- Qualifications, skills and experience
- Training records

Compliance and safeguarding

- Identity documents
- Right to work information (where applicable)
- DBS and Section 128 check outcomes
- Self-declarations (e.g. disqualification, bankruptcy)

Declarations of interest

- Pecuniary and business interests
- Relationships with Trust staff or associates
- Gifts and hospitality
- Governance roles held elsewhere
- Land ownership where relevant
- Political or personal interests relevant to governance decisions

Monitoring and security

- CCTV footage
- Building access records

Special category and criminal convictions data

We may process:

- Information relating to race or ethnicity, religion or belief, sexual orientation or political opinions
- Criminal conviction data (DBS / Section 128), where required by law

How we collect your data

Personal data is collected:

- Directly from you during appointment and throughout your term of office
- From third parties where required by law, such as DBS and Section 128 checking services

We will not obtain personal data from third parties without a lawful basis.

Why we process your data

We process personal data to:

- Appoint and manage governance roles
- Meet statutory safeguarding and due diligence requirements
- Maintain accurate governance records
- Publish required information (e.g. registers of interests, accounts, minutes)
- Comply with Company, Charity Commission and ESFA requirements
- Support effective governance and decision-making
- Protect the reputation and integrity of the Trust

Lawful bases for processing (UK GDPR Article 6)

We process most governance-related personal data under the following lawful bases:

- **Legal obligation** – to comply with education, charity and company law
- **Public task** – to carry out governance functions in the public interest
- **Legitimate interests** – for effective governance, transparency and safeguarding, where appropriate

Consent is used only in genuinely optional circumstances and is not relied upon for statutory governance processing.

Special category data (UK GDPR Article 9)

We process special category data where one or more of the following applies:

- **9(2)(g)** – substantial public interest (safeguarding, transparency)
- **9(2)(b)** – employment, social security or social protection law (where relevant)
- **9(2)(a)** – explicit consent (limited circumstances only)

Automated decision-making

We do not make decisions about Governors, Directors or Members solely by automated means without human involvement.

Sharing your data

Your data may be shared with:

- Trust staff where required for governance purposes
- IT and governance service providers
- Legal advisers and insurers
- Regulators including DfE, ESFA, Ofsted, Companies House and the Charity Commission

All third parties are contractually required to keep data secure and to use it only for specified purposes.

International transfers

Some IT systems may involve processing or storage of data outside the UK. Where this occurs, transfers are carried out in accordance with UK GDPR using appropriate safeguards.

Data security

We use appropriate organisational and technical measures, including:

- IET Data Protection Policy
- Data Retention Policy
- Access controls and audit checks

Data retention

Personal data is retained in line with:

- Legal and regulatory requirements
- Governance and safeguarding needs

We follow the Information and Records Management Society (IRMS) Toolkit (2023).

When no longer required, data is securely destroyed or anonymised.

Your data protection rights

You have the right to:

- Be informed
- Access your personal data
- Request correction
- Request erasure (where applicable)
- Restrict processing
- Object to processing based on public task or legitimate interests (where applicable)
- Data portability (limited circumstances)

We will respond to requests within **one month**.

Requests should be sent to: **GDPR@isleeducationtrust-iet.co.uk**

Changes to purpose

If we need to use your data for a new purpose, we will notify you and explain the lawful basis.

Complaints

For queries or concerns, contact the **Data Protection Officer**.

You may also complain to: **Information Commissioner's Office (ICO)**

Wycliffe House, Water Lane

Wilmslow, Cheshire, SK9 5AF

www.ico.org.uk

Telephone: 0303 123 1113

Privacy notices inform individuals about data use and do not require consent or signature.