

Privacy notice for trustees and trust governance volunteers

Kings Academy Trust



Effective from

1 September 2026

Next review

September 2027, or earlier if processing changes

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1. Introduction

This privacy notice explains how Kings Academy Trust collects and uses personal information about trustees, directors, members and other volunteers carrying out Trust-level governance roles. It applies across the Trust and its academies unless a more specific notice is provided at the point of collection.

Kings Academy Trust is the data controller. We process personal information under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

The Trust's Data Protection Officer is Satswana and can be contacted at admin@satswana.com.

2. Personal information we use

- name, former names, date of birth, nationality, occupation, service address, contact details, postcode and governance identifier
- role, appointing body, start and end dates, attendance, minutes, meeting papers and voting records
- skills, qualifications, employment, references and role-selection information
- business, financial, pecuniary, related-party and other declarations of interest
- signatures and financial-authority records, expenses and vehicle details where relevant
- identity, eligibility, safeguarding, DBS and due-diligence information where applicable
- training, evaluation, communications and access records
- health, disability and accessibility information where needed
- photographs, video and CCTV images created through Trust activities or visits.

3. Why we use it

- appoint and support suitable people in Trust governance roles
- operate effective, transparent and accountable governance and maintain corporate records
- manage board and committee business, financial authority, conflicts and related-party transactions
- meet safeguarding, equality, company, charity, education, funding, audit and regulatory requirements
- publish and share governance information through GIAS, Companies House and other public registers where required
- manage communications, access, expenses, insurance and security.

4. Lawful bases

- Article 6(1)(c), legal obligation: company, charity, education, funding, financial, safeguarding, equality and reporting requirements
- Article 6(1)(e), public task: processing necessary to operate Trust governance and support statutory education functions
- Article 6(1)(f), legitimate interests: organisational security, fraud prevention, legal claims and efficient administration where this is not part of an official public task and your rights do not override the interest
- Article 6(1)(d), vital interests: responding to a life-threatening emergency
- Article 6(1)(a), consent: genuinely optional uses such as particular publicity photographs.

5. Special category and criminal offence data

Some information needs additional protection under data protection law. The special category data we may use includes:

- health, disability and accessibility information
- equality-monitoring information where collected.

We use this information only where it is necessary for the purposes described in this notice and where we have both an Article 6 lawful basis and an Article 9 condition. Depending on the purpose, the Article 9 conditions we rely on are:

- Article 9(2)(g): substantial public interest supported by an applicable DPA 2018 Schedule 1 condition, including safeguarding or equality of opportunity
- Article 9(2)(f): establishing, exercising or defending legal claims
- Article 9(2)(a): explicit consent, where appropriate and freely given.

Photographs and ordinary CCTV images are personal data but are not automatically special category data. They become biometric special category data only if they are technically processed to uniquely identify a person.

Where we use information about criminal convictions or offences, including relevant DBS information, we do so under Article 10 UK GDPR and an applicable condition in Schedule 1 of the Data Protection Act 2018. This will normally relate to employment, safeguarding, preventing fraud or protecting children and other vulnerable people. Where required, the Trust maintains an Appropriate Policy Document.

6. How we collect information

We collect information through appointment and contact forms, statutory filings, declarations, meeting and training records, financial-authority and expenses processes and routine governance communications. We will explain whether information is mandatory or voluntary when it is requested.

We may also receive information from referees, employers, other education providers, the Department for Education, Companies House, the Disclosure and Barring Service, professional bodies, public registers and publicly available sources where proportionate and lawful.

7. Retention and security

We keep trustee and Trust governance information during the appointment and afterwards for the periods set out in the Data Retention Schedule.

The exact period depends on the type of record. We apply the Trust's Data Retention Schedule, taking account of statutory record-keeping duties, safeguarding requirements, financial and audit rules, limitation periods, regulatory guidance and whether information is needed to establish, exercise or defend legal claims. Different periods apply to corporate and statutory records, minutes, accounts, declarations of interest, related-party transactions, safeguarding checks, financial authorities, training and contact information.

We use appropriate technical and organisational measures to protect personal information against accidental loss, unauthorised access, alteration or disclosure. Access is limited to people who need the information for their role. Information is securely deleted or destroyed when it is no longer required.

A copy of the relevant retention schedule or further information about a particular retention period is available from the Data Protection Officer.

8. Sharing and international transfers

Where necessary and lawful, we may share information with the Trust board and academies, the Department for Education, Companies House, the Education and Skills Funding Agency, local authorities, auditors, banks, insurers, professional advisers, service providers, safeguarding bodies, police, courts and regulators. Required information may be published on Trust or academy websites and public registers.

Get Information About Schools (GIAS)

The Trust is required to provide governance information to the Department for Education under the requirements applying to academy trusts, including the Academy Trust Handbook and funding arrangements. Some GIAS information is published to support transparency; identifying information such as date of birth, email and postcode is restricted to authorised users and supports accurate identification and, in a small number of cases, suitability checks.

More information is available at <https://www.get-information-schools.service.gov.uk/>.

International transfers

Some service providers may store or allow access to personal information outside the UK. Before making a restricted transfer, we check that UK adequacy regulations apply, or put in place an appropriate safeguard such as the UK International Data Transfer Agreement or UK Addendum and complete the required data protection test. We use an Article 49 exception only where the law permits. Contact the Data Protection Officer for information about the safeguard used for a particular service.

9. Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- be informed about how we use your personal information
- ask for access to the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information or restrict its use in certain circumstances
- object to processing in certain circumstances, including direct marketing
- receive information in a portable format where the right to data portability applies
- withdraw consent at any time where consent is our lawful basis, without affecting earlier lawful processing
- ask for safeguards and human involvement where a significant decision is made solely by automated means
- complain to us and to the Information Commissioner's Office.

These rights are not absolute. For example, erasure does not normally apply where we must keep information to comply with a legal obligation or perform a public task. We will explain any restriction that applies when responding to a request.

To exercise a right, contact the Data Protection Officer or the Trust's Data Protection Lead using the details in section 12. We may ask for information needed to confirm identity and locate the relevant records.

10. Automated decision-making and profiling

The Trust does not currently make decisions about you based solely on automated processing where the decision has a legal or similarly significant effect. Digital and artificial-intelligence tools may support administrative work, but accountable staff remain responsible for significant decisions.

If this changes, we will update the relevant privacy information before the processing begins and explain the logic involved, likely effects and safeguards, including how to obtain human intervention and challenge a decision.

11. Data protection complaints

You can make a data protection complaint by emailing admin@satswana.com or ddonnelly@kingsacademytrust.co.uk, or by writing to the Trust at the address in section 12. Please describe the issue and the outcome you are seeking.

We will acknowledge receipt within 30 days. Without undue delay, we will make appropriate enquiries, keep you informed where an investigation is continuing, and tell you the outcome and any action taken.

You may also complain to the Information Commissioner's Office. The ICO can be contacted on 0303 123 1113 or through <https://ico.org.uk/make-a-complaint/>. The ICO's postal address is Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact us

Kings Academy Trust, City Approach 1, Albert Street, Eccles, M30 0BG

Data Protection Officer: Satswana — admin@satswana.com

Data Protection Lead: David Donnelly — ddonnelly@kingsacademytrust.co.uk