

NCLT MEMBERS, DIRECTORS/TRUSTEES & ADVISORY GROUP PRIVACY NOTICE

New Collaborative Learning Trust ensures personal data ('relating to an identifiable a living individual') is only processed where there is a lawful basis to do so, observing the seven processing principles set out under the Data Protection Act and UK General Data Protection Regulation.

Who does this notice apply to?

This privacy notice covers personal information relating to anyone involved with New Collaborative Learning Trust in an official governance capacity. This includes members of the Trust's Members, Trust Board of Directors/Trustees, and members of the Advisory Groups for each college and school.

Data controller and collection

The organisation responsible for looking after your personal data (Data Controller) is the New Collaborative Learning Trust. Data is held centrally at Trust Headquarters.

Why do we collect and use the personal information of individuals in governance positions?

The personal information will be used in our Governance Plan for the DfE, in line with our funding agreement. Details of the requirements relating to the funding agreement can be found in the Department for Education's (DfE) Academy Trust Handbook.

We require a skills audit to ensure we have a high standard of effective governance and accountability, in line with DfE recommendations as set out in their publication *Academy Trust Governance Guide (2024)*.

Legal basis for using this information (UK General Data Protection Regulation – 'UK GDPR')

Processing of personal data is considered necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

Depending on the purpose, our processing of your information will be due to one of the following:

- For the performance of a contract [Article 6(1)(b)] by agreeing to perform the role
- To meet a legal requirement [Article 6(1)(c)] for instance, provision of personal data to the DfE
- To protect the vital interests of you or someone else [Article 6(1)(d)] for instances to the emergency services
- Delivering a public task [Article 6(1)(e)], for instance recording details of contribution to meetings

Categories of Information

We collect the following information;

- name
- date of birth
- address
- email
- contact details
- pen portrait
- proof of identity
- employment information (past and current)
- any health conditions you have that we need to be aware of
- information about disability and access requirements
- register of interests information
- disclosure and barring service in respect of criminal offence data
- skills audit
- photographs and CCTV images captured in school
- attendance at meetings and the contributions made

We collect the information for the following reasons:-

- to assess skill and suitability to maintain effective governance
- meet statutory obligations for publishing and sharing details
- facilitate safe recruitment, as part of our safeguarding obligations
- ensure appropriate access arrangements can be provided for volunteers
- undertake equalities monitoring
- to allow declarations of any conflicts of interest, and
- to obtain contact information required to fulfil the role.

We ask all Members/Director/Trustees and Governance Panel members ("Governance Individuals") to submit a 'pen portrait' of themselves, with a photograph, to feature on our website and other publicly accessed material. We use personal email addresses to contact Governance Individuals with important information regarding their role. We use postal addresses for any contact required in a letter format. We ask Governance Individuals to complete a Skills Audit.

How is this information collected?

Information is collected through the Application Form, images provided by the Governance Individual or taken using Trust photographic equipment, Identity documents, third-parties (e.g. Disclosure and Barring Service, DfE), meetings, *Skills Audit*, *Register of Interest* form. Minutes of meeting will record your attendance and contributions.

Storing Governance Individuals' Data

We store all Governance Individuals' information electronically, paper copies of information are processed and destroyed confidentially. We retain information for the following lengths of time, in line with sector guidelines:

- Personal Details (Name, DOB, etc.) Relationship + 6 Years
- Contact details (Address, email, telephone number) Relationship + 6 Years
- Employment information (past and current) Relationship + 6 Years
- Register of interests information Relationship + 10 Years
- Skills Audit Information Relationship + 6 Years

(* data may be held for up to 25 years for Child Protection reasons as set out in the Trust's ROPA records)

Who do we share Governance Individual information with?

Under the conditions of our funding agreement, we are required to publish information for each individual on our website. This information must include any relevant material business or pecuniary interests that individuals may have, including any governance roles in other educational institutions. It must also include any material interests' individuals may have arising from close family relationships between those involved in governance, or between them and senior employees. Governance Individuals' information is required to be published in the Trust's Annual Report and Financial Statements.

As part of our funding agreement, we must also provide information to *Get Information About Schools* (GIAS). The Department for Education becomes the data controller, and holds this information on their Edubase national register of Governors. Not all of the information collected via GIAS is published. All information is processed in line with data protection legislation. We do not pass information on to third parties for purposes outside of our obligations as set out in our funding agreement.

We also share information with the following:-

- The relevant Local Authority
- Other Members, Trustees or members of the Advisory Groups
- Disclosure and Barring Service
- Our staff
- Police forces and Courts

Your rights to your personal data

You have rights relating to the personal data that we collect and use. The rights you have depend on the legal basis of us using the information. These are summaries below.

Legal Basis	Right under the Law						
	Informed	Access	Rectification	Erasure	Restriction	Portability	Objection
Consent Art.6(1)(a)	✓	✓	✓	✓	✓	✓	Withdraw consent
Legal Obligation Art.6(1)(c)	✓	✓	✓	X	✓	X	X
Vital Interest Art.6(1)(d)	✓	✓	✓	✓	✓	X	X
Public Interest Art.6(1)(e)	✓	✓	✓	X	✓	X	✓
Legitimate Interest Art.6(1)(f)	✓	✓	✓	✓	✓	X	✓

Requesting access to your personal data

Under data protection legislation individuals have the right to request access to information about them that we hold. To make a request, please email the Trust's Data Protection Officer data.protection@nclt.ac.uk.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance, or subsequently directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss, or require clarification regarding this privacy notice, please contact the NCLT Data Protection Officer. Enquiries can be forwarded to data.protection@nclt.ac.uk or by calling 01977 802802.