MOSAIC SCHOOLS LEARNING TRUST

PRIVACY NOTICE FOR GOVERNORS AND TRUSTEES

All schools in Mosaic Schools Learning Trust are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

Staff Responsible:	DPO
Approved by:	Board of Trustees
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VERSION CONTROL

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Contents

1. Introduction 4
2. Categories of governor and trustee information that we process 4
3. Our Lawful Basis for using this data 4
4. Why we collect and use this information 5
5. How we store this data 6
6. Data sharing 6
7. Department for Education (DfE) 7
8. How government uses your data 7
8.1 Data collection requirements 8
8.2 How to find out what personal information the Department for Education (DfE) hold about you 8
9. Transferring data internationally 8
10. Your rights 8
11. Last updated 9
12. Complaints 9
13. Contact us 9

Privacy notice for governors and trustees

1. Introduction

Under data protection law, individuals have a right to be informed about how the trust uses any personal data we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals working with the Trust in a voluntary capacity, including governors and trustees.

We, Mosaic Schools Learning Trust (MSLT), of Towncourt Lane BR5 1EL, are the 'data controller' for the purposes of data protection law.

See 'Contact us' below for details of our Data Protection Officer.

2. Categories of governor and trustee information that we process

The categories of governor and trustee information that we process include:

- personal identifiers, characteristics (such as name, date of birth), contact information (such as address, email address, phone number)
- governance details (such as role, start and end dates and governor ID)
- Information relating to safeguarding (DBS checks)
- Skills, training and CPD information
- References and employment details
- Information about business and pecuniary interests

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements
- DBS details

3. Our Lawful Basis for using this data

We only collect and use personal information about you when the law allows us to. The Trust has the legal right, and legitimate interest to collect and process personal data relating to governors and trustees who work with the Trust. We collect and use governor information, for the following purposes:

- to meet the statutory duties placed upon us including publishing and sharing governor and trustee details on school websites and GIAS
- to meet safeguarding requirements (including DBS checks, section 128 checks)
- to assist in the running of the Academy Trust
- to assess governor skills
- Training/CPD
- Undertake equalities monitoring

Under the UK GDPR, the legal bases we rely on for processing personal information for general purposes are:

- The Trust's Master Funding Agreement with the Department for Education
- The Trust'slegal framework- Academies Act 2010, Academies Financial Handbook, Charities Act 2011 and Companies Act 2006 and Education Act 2011
- Safeguarding Vulnerable Groups Act 2006 and Keeping Children Safe in Education 2025 regulations and barred list and prohibition checks.
- The Childcare (Disqualification) Regulations 2009
- for the purpose named above in accordance with the legal basis of Legal Obligation

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

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.

4. Why we collect and use this information

The personal data collected is essential, in order for the school to fulfil their official functions and meet legal requirements. The Trust collects personal information via both paper based and secure electronic forms.

We only collect and use personal information about you when the law allows us to. We process this information under Article 6 & Article 9 of the General Data Protection Regulations (UK GDPR) on one of the following bases:

- Legitimate Interest: processing is carried out in the course of the school's legitimate activities

- Legal obligation: the processing is necessary for the school to comply with the law

- Public task: the processing is necessary for the school to perform a task in the public interest or for official functions, and the task or function has a clear basis in law Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Governance roles data is essential for the 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.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

5. How we store this data

Personal data is stored in accordance with our data protection and data retention policies. We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the Trust.

When your relationship with the Trust has ended, we will retain and dispose of your personal information in accordance with our Data Retention Policy. A copy of this policy is available on request.

6. Data sharing

We do not share information about our governors/trustees with anyone without consent unless the law and our policies allow us to do so.

Where necessary, third parties may be responsible for processing of governor and trustee personal information. Where this is required, the Trust places data protection requirements on third party processors to ensure data is processed in line with governor and trustee privacy rights. Where information needs to be shared and the Trust does not have a legal basis for this processing, governors/trustees will be contacted to provide consent.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies – to meet our legal obligations to share information about governors/trustees
- Our local authority – to meet our legal obligations to share certain information with it, such as details of governors
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor/trustee support
- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts
- If we are considering restructuring the trust (by way of merger or otherwise), we may share your information with the other parties involved (such as the local authority, the Department for Education and/or the other academy trust/school(s) involved) and with the relevant professional advisors. – to perform tasks in the public interest and legal obligation.

7. Department for Education (DfE)

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 the requirements set out in the Academies Financial Handbook academy trust handbook

All data is entered manually on the Get Information About School (GIAS) system and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see 'How government uses your data' section.

8. How government uses your data

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- increase the transparency of governance arrangements
- enable local authority maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow the Department for Education (DfE) 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

8.1 Data collection requirements

To find out more about the requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to https://www.gov.uk/government/news/national-database-of-governors

Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in account 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 for Education (DfE) unless the law allows it.

8.2 How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a subject access request (SAR). Further information on how to do this can be found within the Department for Education's (DfE) 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

9. Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with UK data protection law.

10. Your rights

How to access the personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the Trust holds about them.

To make a request for your personal information, please contact the DPO.

You also have the right to:

- ask us for access to information about you that we hold
- 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
- 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 (ICO) at Information Commissioner's Office.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the How Government uses your datasection of this notice.

11. 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 September 2025.

12. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

13. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer: dpo@mslt.org.uk