Vanguard Learning Trust

Privacy notice for governors, members, trustees, and other volunteers

Data Protection legal basis

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that is held about them. The Trust complies with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where their personal data is being processed.

This privacy notice explains how personal data about individuals working with schools or for the Trust in a voluntary capacity, including governors, trustees, members and parent helpers is collected, used and stored.

Data controller

Vanguard Learning Trust is a registered 'data controller' for the purposes of data protection law. The Trust has a central data protection policy, a copy of which is available on the Trust's website (click here). All Trust schools have a data protection lead (DPL) who is the first point of contact for any queries or subject access requests. The Trust is also required to appoint a data protection officer (DPO). The Trust's DPO is Karen Williams, Business Manager, Vyners School. Her contact details are: Karen Williams, Vyners School, Warren Road, Ickenham, UB10 8AB, 01895 234342, office@vynersschool.org.uk.

Schools

The Trust's schools are:

- Field End Junior School
- Hermitage Primary School
- Ruislip High School
- Ryefield Primary School
- Vyners School

Categories of governance information processed

Personal data that may be collected, used, stored and shared (when appropriate) includes, but is not restricted to:

- Contact details including name, address, telephone numbers, email addresses
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

The Trust may also collect, use, store and share (when appropriate) information that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions that the Trust needs to be aware of
- Race, ethnicity, religious beliefs, and sexual orientation
- Information about disability and access requirements
- Photographs and CCTV images captured in school

Information about criminal convictions and offences may also be collected, used, stored and shared (when appropriate).

Data may also be held that has been received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

Why governance information is collected and used

The personal data collected is essential, in order for the Trust to fulfil its official functions and meet legal requirements. Governance information is collected and used for the following purposes:

- to meet the statutory duties placed upon the Trust for publishing and sharing governors', trustees' and members' details;
- to establish and maintain effective governance;
- to facilitate safer recruitment, as part of safeguarding obligations towards students;
- to undertake equalities monitoring; and
- to ensure that appropriate access arrangements can be provided for volunteers who require them.

Under the UK General Data Protection Regulation (GDPR) 2018, the legal bases relied on for processing personal information for general purposes are:

- To carry out a task in the public interest
- To comply with a legal obligation

All academy trusts, under the academy trust handbook, have a legal duty to provide the governance information as detailed above.

Less commonly, personal information may also be used when:

- Consent has been given to use it in a certain way;
- Vital interests need to be protected; or
- there is a legitimate interest to share the information.

Where consent has been provided to use data, this consent may be withdrawn at any time. This will be made clear when requesting consent, and it will be explained how to withdraw consent if required.

'Special category' data and criminal offence data will only be collected and used when there is both a lawful basis, as set out above, and one or more of the conditions for processing as set out in UK data protection law.

Collecting governance information

The majority of personal information will be collected from the individual, but the Trust may also hold data provided by the following:

- local authorities
- government departments or agencies
- police forces, courts, tribunals

Governance roles data is essential for the Trust's operational use. Whilst the majority of personal information provided is mandatory, some of it may be requested on a voluntary basis. In order to comply with UK-GDPR, individuals will be informed at the point of collection, whether they are required to provide certain information or if they have a choice in this.

Storing governance information

Data is held securely for the set amount of time shown in the data protection and retention policy. More information on the data retention procedure and how data is kept safe is available on the Trust's website (click here).

Who governance information is shared with

Information about individuals in governance roles is not shared with anyone without consent unless the law and policies allow it. Information may be shared with:

- Government departments or agencies: to meet legal obligations to share information about members, trustees and governors;
- Local authorities (the Trust's schools are based in the London Borough of Hillingdon): to meet

legal and statutory obligations to share certain information with them;
- Suppliers, contractors and service providers: to enable them to provide any services they have been contracted for, such as governance support; and
- Police forces, courts: in order to uphold law and order.

Requesting access to your personal data

The UK GDPR gives certain rights about how information is collected and used. To make a request for personal information, Karen Williams, data protection officer, can be contacted at Vyners School, Warren Road, Ickenham, UB10 8AB, 01895 234342, office@vynersschool.org.uk.

An individual's rights include:

- the right to be informed about the collection and use of personal data – this is called 'right to be informed'.
- the right to ask for copies of personal information being held – this is called 'right of access', also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask for any information to be changed that is not accurate or complete – this is called 'right to rectification'.
- the right to ask for personal information to be deleted – this is called 'right to erasure'.
- the right to ask for information to stop being used – this is called 'right to restriction of processing'.
- the 'right to object to processing' of information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if it is felt that the information has not been used in the right way.

There are legitimate reasons why an information rights request may be refused. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is a legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, there is no right to object, but there is a right to withdraw consent.

If there is a concern about the way the Trust is collecting or using personal data, the concern should be raised with the Trust in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO. 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 data section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where consent has been given to process personal data, individuals have the right to withdraw that consent. If an individual changes their mind, or are unhappy with the use of their personal data, they can contact Karen Williams, data protection officer, at Vyners School, Warren Road, Ickenham, UB10 8AB, 01895 234342, office@vynersschool.org.uk.

How government uses data

The Department for Education (DfE) collects personal data from educational providers and local authorities. The Trust is required to share information about individuals in governance roles with the DfE under the requirements set out in the academy trust handbook. All data is entered manually on the GIAS service and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework.

The governance data that is lawfully shared with the 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 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

Data collection requirements

More information about the requirements placed on the Trust by the DfE, including the data that is shared with them, can be found on the DfE's website (click here). Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised DfE and education establishment users with a DfE sign-in account who need to see it in order to fulfil their official duties. The information is for internal purposes only and is not shared beyond the DfE unless the law allows it.

How to find out what personal information the DfE holds

Under the terms of the Data Protection Act 2018, individuals are entitled to ask the DfE:

- if they are processing personal data
- for a description of the data they hold
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of the personal data and any details of its source

If an individual wants to see the personal data held about them by the DfE, they should make a subject access request (SAR). Further information on how to do this can be found within the DfE's personal information charter that is published on its website (click here or here). The DfE can be contacted here.

Contact

To discuss anything in this privacy notice, please contact: Karen Williams, data protection officer, at Vyners School, Warren Road, Ickenham, UB10 8AB, 01895 234342, office@vynersschool.org.uk.

Version history

Revision date	By	Summary of Changes Made
April 2025	Board of trustees	New document based on template from National Governance Association.