Privacy Notice

For Trustees: Use of your
child's personal data

September 2026

Under new data protection law, individuals have a right to be informed about how Sandon Primary Academy uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **your child.**

We, Sandon Primary Academy are the 'data controller' for the purposes of data protection law.

Our data protection officer is Mrs K Burrows. You can contact our DPO by emailing info@sandonprimary.org.uk

Sandon Primary Academy is the data controller for the personal information covered by this notice. It explains how we collect, use, store and share information about people carrying out governance roles, including trustees, governors and the clerk to the board.

Our Data Protection Officer is Mrs K Burrows (Vice Principal). Email info@sandonprimary.org.uk, marked FAO: Data Protection Officer, or telephone 01782 319097.

1. Governance information we process

- Personal identifiers and contact information, including name, former names where relevant, date of birth, address, postcode, telephone number and email address.
- Governance details, including role, appointing body, start and end dates, term of office and governor or GIAS identifier.
- Information required for statutory or suitability checks, including identity and DBS/Section 128 check information where applicable.
- Declarations of business, financial and pecuniary interests and other relevant interests or relationships.
- Meeting attendance, committee membership, offices held, responsibilities and records relating to governance activity.
- Training, skills, experience and development records.
- Correspondence and information needed to administer and support the governing board.
- Photographs or biographical information where supplied for governance or publication purposes.

We only collect information that is relevant and necessary for the purposes for which it is used.

2. Why we collect and use governance information

- Meet statutory, regulatory and funding-agreement duties placed on the academy.
- Maintain an accurate record of the academy's governance arrangements.
- Complete appropriate identity, safeguarding and suitability checks.
- Administer appointments, terms of office, committees, meetings and governance records.
- Arrange and record governance training and development.
- Manage declarations of interests and support transparent decision-making.
- Communicate with people in governance roles and provide information needed to carry out their duties.
- Provide required governance information to the Department for Education (DfE), Companies House and other relevant bodies.
- Safeguard children and support the academy's legal and regulatory compliance.

3. Our lawful reasons for processing

Under the UK GDPR, we must have a lawful basis for each use of personal information. For most governance processing, Sandon relies on Article 6(1)(c), compliance with a legal obligation, and/or Article 6(1)(e), performance of a task carried out in the public interest or in the exercise of official authority. Where a different basis applies to a particular activity, such as consent, we will identify it when the information is collected.
Where special category personal data is processed, we also identify an appropriate Article 9 condition and, where required, a condition under the Data Protection Act 2018.
As an academy, relevant requirements include the Academy Trust Handbook and the academy's funding and governance obligations. Academy trusts also have duties under the Companies Act 2006 in relation to information about members and directors.

4. How we collect governance information

We collect information directly from individuals through governor/trustee appointment and contact forms, declarations of interest, skills and training records, identity and safeguarding checks, meeting and attendance records, and correspondence. We may also receive relevant information from the DfE, Companies House, the Disclosure and Barring Service (DBS), the clerk to the board and other organisations where the law permits or requires this.

Most governance information is necessary for the academy's operational, statutory or regulatory purposes. Some information may be voluntary. We will make clear at the point of collection whether information must be provided and, where appropriate, the consequences of not providing it.

5. Storing and protecting governance information

We hold governance information securely and only for as long as it is required. Retention periods are set out in the academy's records management and retention arrangements. These are available from the school office and, where published, on www.sandonprimaryacademy.com.
Access to governance information is limited to people who need it for their role. Where information is transferred electronically, we use appropriate secure systems and controls. If personal data is transferred outside the UK, we ensure that the transfer complies with data protection law and appropriate safeguards are in place.

6. Who we share governance information with
We share governance information only where there is a lawful reason and only the information that is necessary. Depending on the circumstances, recipients may include:

- The Department for Education (DfE), including through Get Information about Schools (GIAS).
- Companies House, where information about academy company members or directors must be provided.
- The Disclosure and Barring Service (DBS) and other bodies involved in required suitability or safeguarding checks.
- The clerk to the governing board and authorised school staff who administer governance.
- Other members of the governing board where necessary for governance business. Contact details will only be shared for general communication where there is an appropriate lawful basis.
- Ofsted, auditors, professional advisers, insurers and regulators where required or appropriate.
- Stoke-on-Trent City Council or other public bodies where there is a lawful requirement or legitimate governance need.
- Service providers acting on our behalf under appropriate data-protection arrangements.
- The public, where governance information is required to be published on the academy website or a statutory public register.

We do not rely on consent for disclosures that are required by law. Where consent is genuinely the lawful basis, it can be withdrawn at any time without affecting processing already carried out.

7. Department for Education and GIAS
The DfE collects governance personal data from educational providers. As an academy, we are required to provide governance information in accordance with requirements applying to academy trusts, including the Academy Trust Handbook. Governance information is entered on GIAS and held by the DfE using government security controls.

The governance data lawfully shared through GIAS is used to increase transparency of governance arrangements, help identify individuals involved in governance across more than one setting, and, in a small number of cases, enable checks relating to suitability for governance roles.
Some governance information in GIAS is not publicly available. Access to non-public information is restricted to authorised users who need it for their official duties, and the DfE may share information where the law allows it.
DfE governance privacy notice model: https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices
Get Information about Schools: https://get-information-schools.service.gov.uk/
DfE contact details: https://www.gov.uk/contact-dfe

8. Companies House
Sandon Primary Academy is an academy company. Where an individual is a member or director/trustee, information required by company law is supplied to Companies House. Information held on the Companies House register may be publicly available in accordance with company law and Companies House rules.

9. Safeguarding and suitability checks
The academy records evidence that required checks have been completed for individuals in governance roles. This may include DBS and Section 128 checks where applicable. Information is handled in accordance with safeguarding requirements and the academy's retention arrangements.

10. Your data protection rights
Your rights depend on the lawful basis and circumstances of the processing. They include:

- The right to be informed about how your personal data is used.
- The right of access to personal information we hold about you, including by making a subject access request (SAR).
- The right to ask for inaccurate or incomplete information to be corrected.
- The right to erasure in certain circumstances.
- The right to restriction of processing in certain circumstances.
- The right to object to processing in certain circumstances.
- Rights relating to automated decision-making and profiling.
- The right to data portability where the legal conditions for that right are met.
- The right to withdraw consent at any time where consent is the lawful basis.
- The right to complain to the Information Commissioner's Office (ICO).

These rights are not absolute. For example, the right to erasure does not apply where information must be processed to comply with a legal obligation or perform a public task. We will explain our decision if a right does not apply to a particular request.

To exercise a right in relation to information held by Sandon Primary Academy, contact our Data Protection

Officer.

Information about requesting personal data held by the DfE:
https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

11. Complaints
If you have a concern about our collection or use of your personal information, please contact our Data Protection Officer first so that we can try to resolve it. You also have the right to complain to the Information Commissioner's Office.
ICO complaints: https://ico.org.uk/make-a-complaint/
ICO telephone: 0303 123 1113. Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact and review
Data Protection Officer: Mrs K Burrows (Vice Principal)
Email: info@sandonprimary.org.uk, marked FAO: Data Protection Officer
Telephone: 01782 319097

This notice was updated in September 2026. We will review and update it where our processing, legislation or relevant guidance changes.