Privacy Notice

Members and Trustees

The Cornerstone Academy Trust needs to collect, store and process data on Members and Trustees to be able to efficientlyconduct the governance of the Trust. Only essential data is held and there are clear processes in place that govern how we collect use, store and share the data. Information is shared with the Department for Education, Companies House, The Charity Commission and the Local Authority.

Under data protection law, individuals have a right to be informed about how the school uses any personal data that 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 your personal data.

We, The Cornerstone Academy Trust, are the 'data controller' for the purposes of data protectionlaw.

Our Data Protection Liaison Officer is Kyriaki Constanti. She can be contacted via DPO@tcat.education

The personal data we hold

We process data relating to Members and Trustees. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- personal identifiers (eg full name)
- date of birth
- contact details including home address, email address and telephone number
- date of appointment
- term of office
- date they stepped down (where applicable)
- relevant business and pecuniary interests (as recorded in the register of interests)
- governance roles in other educational institutions
- any material interests arising from relationships between governors or relationships between governors and school staff (including spouses, partners and close relatives)
- date of birth
- Disclosure and Barring Service certificate information
- images (these may be captured during official school photos, class work, activities, performances or on school CCTV)
- relevant training, qualifications and employment history

- disability, health and dietary information (where applicable)
- facial photograph for use on identification badges and for publication on our website (if consent has been obtained)
- IT usage data (if school systems are accessed)

Why we use this data

The purpose of processing this data is to help us govern the Trust, including to:

- comply with our legal obligations and governance standards in relation to Member, Trustee, Governor and Clerk appointments under The Academy Trust Handbook 2025 build a comprehensive picture of our school governance and how it is deployed
- inform relevant authorities, organisations and other relevant persons of our appointments
- enable individuals to be kept informed of the governance training available to them, book them on the training and keep them informed about other relevant information regarding their appointment duties
- respond to complaints, grievances and discipline investigations
- assess the quality of our services
- education provision
- meet statutory duties placed upon us by the Department for Education
- safeguard the health and welfare of our members, governors, trustees, clerks and students

Legal Basis for processing

When processing personal data about our employees, we rely upon the following legal bases, which are set out in Article 6 of the UK GDPR.

- It is necessary for us to perform a task carried out in the public interest or in the exercise of our official duties (eg education provision)
- it is necessary for us to comply with a specific legal obligation (eg employment law, tax law)
- it is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject, prior to entering into a contract
- the data subject has provided their consent
- it is necessary to protect the vital interests of a person (eg emergency medical care)

When we process special category data about our employees, we rely on one or more of the following additional legal bases, as set out in Article 9 of the UK GDPR:

- the data subject has given us their explicit consent
- it is necessary for us to carry out our obligations and exercise our or the data subject's specific rights relating to employment, employment law, social security and social protection law
- processing is necessary to protect the vital interests of a person where the data subject is physically or legally incapable of giving consent
- it is necessary for the establishment, exercise or defence of a legal claim
- it is necessary for the assessment of the working capacity of an employee
- it is necessary for reasons of substantial public interest

Other legal bases listed in Article 9 of the UK GDPR may also apply, depending on the

processing required.

Monitoring of school systems and devices:

The Trust uses an online safeguarding and monitoring system known a**s** Lightspeed to support pupil and staff safety, maintain secure school systems, and meet its statutory safeguarding and online safety obligations.

Monitoring is intended to protect pupils, staff and the school community and is carried out in a way that respects staff privacy and professional expectations.

Lightspeed operates on **s**chool-owned and school-managed devices and systems, including Microsoft 365 applications such as Microsoft Teams, and provides safeguarding-related oversight of online activity. This may include reviewing websites visited, search terms entered, keywords typed, images viewed or shared, and messages or images exchanged within school-managed systems, where this functionality is enabled.

Monitoring is targeted and proportionate, and is focused on identifying safeguarding, security or appropriate-use concerns. It is not used for routine performance management or productivity monitoring.

Lightspeed does not use webcams or microphones and does not monitor personal devices or personal accounts that are not connected to school-managed systems.

Any information flagged by Lightspeed is reviewed by authorised staff only, such as designated safeguarding leads or senior leaders, and access is strictly role-based.

Where monitoring identifies a potential safeguarding concern, information may be shared with relevant internal teams and, where necessary, external safeguarding agencies, in line with statutory guidance.

Where monitoring identifies a potential breach of the Trust's policies or raises a safeguarding, security or conduct concern, the information may be used as part of an investigation and, where appropriate, may contribute to disciplinary or other formal procedures.

Who do we share data with and why?
Department for Education (DfE):

We are required to share workforce information (this is known as the workforce census) with the DfE, so they can fulfil their statutory obligations relating to data collection. We are required to share information about our school employees with the DfE under Regulation 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England. For information about how the DfE collects and shares workforce data for research purposes, visit their website at https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data

Biometric Data

Where biometric data is enabled, Trustees may use biometric authentication, such as facial or fingerprint recognition through Microsoft Windows Hello for Business, to securely access Trust devices and systems. The legitimate basis for processing is 'explicit consent'.

Our Local Authority:

We may be required to share information about our employees with our local authority under Regulation 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Other:

We may also need to share personal data with payroll and pension providers, Occupational Health services, IT and HR system providers and regulatory bodies (eg Ofsted, DBS).

In all cases, we will take reasonable steps to ensure that all third parties comply with UK data protection legislation.

Retention Periods:

Except as otherwise permitted or required by applicable law or regulation, we will only retain personal data for as long as necessary to fulfil the purposes we collected it for as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Full details on how long we will retain your personal data for is set out in our Records Retention Schedule available on our website.

Data is securely deleted when no longer needed.

Security of your Information

We have put in place measures to protect the security of your information (ie to prevent it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

For further information regarding how the Trust keeps our personal data safe, please refer to our Data Protection Policy.

International Transfers

Every effort is taken to try and use third party suppliers within the boundaries of the European Economic Area (EEA) to ensure the data protection rights of individuals. However, there may be

occasions where the system supplied by an organisation is outside of the EEA for example the United States. Where personal data is transferred outside the UK or EEA to a country that is not designated as 'adequate' in relation to data protection law, we will ensure the personal data is adequately protected using International Data Transfer Agreements, appropriate security measures, and other appropriate safeguards.

Your data protection rights

Your right of access

You have the right to ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process.

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing

You have the right to object to us processing your information where we consider this is necessary for us to perform a task in the public interest. You can also object to us using your contact details to send you direct marketing or fundraising communications.

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under a contract (or in talks about entering into a contract) and the processing is automated.

Your right to withdraw consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact DPO@tcat.education

Once we have received your notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

Your right to complain

We work to high standards when it comes to processing your personal information. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right. To make a complaint, please complete our Data Protection Complaints Form, available on our website or directly via the link below:

Data Protection Complaints Form - The Cornerstone Academy Trust

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO). The ICO's contact details are available at https://ico.org.uk/concerns

You are not required to pay a charge for exercising your rights and we have one calendar month to respond to you, which can be extended by up to a further two calendar months for complex requests. Please bear in mind that this may be difficult for us to achieve should you submit your request either just before or during a school holiday, however we will do our best to keep you informed about when you can expect us to respond to you.

Further Information

If you have any queries about this privacy notice, or the way your personal information is being handled by the school, see our Data Protection Policy which is publicly available on our website or please contact our Data Protection Liaison Officer.

Further information about your data protection rights, can be found on the Information Commissioner's Office website at www.ico.org.

Updates to this Notice

Reviewed by (job role):	**Date:**	**Next Review Date:**
Full Trust Board	February 2024	February 2026
DPO / DPLO	24th February 2026	February 2028
DPLO	5th October 2026	February 2028
DPLO	16th October 2026	February 2028