# Governance Privacy Notice

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| Policy owner: | Data Protection Officer (DPO) |
| Approved by: | Chief Operating Officer |
| Ratified by: | Trust Leadership Team |
| Date: | September 2026 |
| Date of next review: | September 2028 |

# 1 Introduction

To ensure Coastal Collaborative Trust (CCT) is run effectively whilst supporting the education of our children and young people, the Trust collects and uses information about its Members, Trustees and Governors. For the purposes of this policy Members, Trustees and Governors are referred to as 'you' or 'your', and the Trust is referred to as 'we' or 'ours'.

Under data protection law, you have the right to be informed about how we collect, store and use your personal data. This privacy notice ensures compliance with the law.

We, the Coastal Collaborative Trust (CCT) are the 'data controller' for the purposes of data protection law.

# 2 Collection of Data

## 2.1 What information do we collect

The categories of information that we collect are:

- personal details;
- contact details;
- professional details;
- relevant business and pecuniary interests;
- role application details;
- references;
- identity verification records;
- meeting attendance records;
- records of communications;
- records of visits to our Academies;
- photographs;
- CCTV images captured on CCT premises;
- records of the work you do in conjunction with our staff and students;
- notes of meetings you may have attended.

We are also required to collect and use information that is given additional protection under the General Data Protection Regulations (GDPR), for example:

- Demographic information required for equal opportunities monitoring

## 2.2 Why we collect and use governance information

The personal data collected is essential, in order to fulfil our official functions and meet legal requirements.

We collect and use governance information, for the following purposes:

a) to establish and maintain effective governance;
b) to meet the statutory duties placed upon us;
c) to enable you to work with us;
d) to maintain a safe working environment for our students;
e) to ensure your health and safety;
f) to keep you up to date with news about the Trust and our Academies

Under GDPR, we have a legal duty to process personal information for the above purposes. Details can be found in the Academy Trust Handbook

### 2.3 What is our legal basis for doing this?

Under Article 6 UK GDPR, we process governance information under one or more of the following lawful bases:

- Article 6(1)(c) Legal Obligation - I.e. providing information to the Department for Education (DfE);
- Article 6(1)(e) Public Task – i.e keeping a record on meetings
- Article 6(1)(f) Legitimate Interests – i.e maintaining contact lists to communicate governance updates and meeting information
- Article 6(1)(a) Consent – i.e publishing photographs on internal newsletters and information leaflets

The precise lawful basis depends upon the particular processing activity.

Where we use a special category of personal data we process this under the following exemptions from section 9 of the GDPR.

- Article 9(2)(g) Substantial Public Interest together with the relevant provisions of the Data Protection Act 2018, including equality of opportunity and treatment monitoring.

### 2.4 How do we collect your personal data?

We collect personal information through:

- applications
- declaration of interests
- skills audits
- GovernorHub
- meeting records.

Data collected is essential for the Trust'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.

### 2.5 How will we store your personal information?

The personal data we collect and use is kept within our systems or in manual files. We use email, shared drives and GovernorHub to enable authorised users to transfer information to one another.

Some personal data is kept for different lengths of time. Retention periods are determined by our Data Protection Policy and Retention Schedule. Governance records are normally retained for six years after the end of appointment, although some records may be retained for longer where required by legislation or for the establishment, exercise or defence of legal claims.

If you would like to know how long we keep a specific piece of personal data, please contact the Trust's Data Protection Officer (DPO) whose details can be found at the end of this privacy notice.

## 2.6 Will you share my personal data?

We do not share personal information about you without consent, unless the law and our policies allow us to do so.

We routinely share information with the DfE who collect personal data from educational settings and local authorities.

- DfE
- ESFA
- Auditors
- Regulators
- Internal and external investigators
- Governance support providers
- Legal advisers
- GovernorHub
- Disclosure and Barring Service (where applicable)

We are required to share information under the requirements set out in the Academies Financial Handbook.

All data is entered manually on the Get Information About Schools (GIAS) system and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework. For more information, please see 'how the government uses your data' by following this link.:

### 2.6.1 Processors

We also use carefully selected service providers who process information on our behalf, including governance management systems (such as GovernorHub), IT service providers and secure cloud hosting services. All of these processors are included in our Register of Processing Activities (ROPA) and have undergone the appropriate due diligence to ensure they meet the relevant UK GDPR standards.

### 2.6.2 International Transfers

We do not routinely transfer governance information outside the United Kingdom. Where personal data is transferred outside the UK, appropriate safeguards will be applied in accordance with UK GDPR.

## 2.7 Can I request access to my data?

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your information, contact dpo@cctrust.uk.

You also have the right to:

- ask us for access to information about you that we hold;
- to have your personal data rectified, if it is inaccurate or incomplete;
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- to restrict our processing of your personal data, i.e. permitting its storage but no further processing;
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics;

The Trust does not undertake automated decision-making or profiling that produces legal or similarly significant effects.

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

For further information on how to request access to personal information held centrally by DfE, please see 'how the government uses your data' by following this link.

**2.8 Can I withdraw my consent?**

Where we rely on consent as the lawful basis for processing, you have the right to withdraw that consent at any time. This does not affect the lawfulness of processing undertaken before consent was withdrawn. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the dpo@cctrust.uk.

**2.9 Will this privacy notice change?**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. The latest version will always be available on the GovernorHub for your reference.

**2.10 Who should I contact if I need any further information?**

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer, dpo@cctrust.uk