The Sycamore Church of England Trust

Grow together, Learn forever

Privacy Notice: Trustees and Volunteers

Applicable to:	All Trust Schools
Adopted By:	Trust Board
Date Adopted:	October 2022
Authorised Signatory:	
Mr Ian Young – Trust Leader and CEO	
Mr Mark Granby – Chair of Board of Trustees	
Review Period:	Annually
Next Review:	January 2027

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Record of Policy Changes and/or Reviews

Date	Details	Reason for Review/Change
January 2026	Sentence added to complaints section: We will acknowledge your concern within 30 days and will respond without undue delay.	ICO advice following review

Introduction

Under data protection law, individuals have a right to be informed about how the Trust 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 and why we collect, store, and use personal data about Trustees and Volunteers.

We, The Sycamore Church of England Trust are the 'data controller' for the purposes of data protection law. The Trust is registered as a data controller with the Information Commissioners Office (ICO). Our registration number is ZA253323

This Privacy Notice relates to The Sycamore Church of England Trust, and its constituent Academies:

- Christ Church C.E Primary School
- St. John's C.E Primary School
- Radcliffe Hall C.E / Methodist Primary School
- St Stephen's C.E Primary School
- St Thomas's C.E Primary School
- Holy Trinity C.E Primary School

and any other Academy which joins the Trust in the future (hereafter referred to as the 'Trust').

Our data protection officer is Shard Business Services (see 'Contact us' below).

1. Data Protection Principles

Personal Data must be processed in accordance with the six Data Protection Principles. It must be:

- used lawfully, fairly and in a transparent way.
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- relevant to the purposes we have told you about and limited only to those purposes.
- accurate and kept up to date.
- kept only as long as necessary for the purposes we have told you about.
- kept securely.

2. Categories of data we collect.

The categories of Trustee personal data that we collect, process, hold, and share include but is not limited to:

- Contact details.
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- DBS Checks and Children's Barred list information
- CCTV images (not all sites)
- Any other personal data we will inform you of from time to time.

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

- Special characteristics including racial or ethnic origin.
- Religious or philosophical beliefs
- Medical information, including details of any medical conditions, including physical and mental health, GP contact details, allergies, medication, dietary requirements, and reasonable adjustments.

3. Collecting this information

We collect personal data from:

- CVs and application forms
- From third parties including references from previous employers; the Local Authority or other agencies (e.g., DBS Checks)
- During your term of service with us
- In addition, we also use CCTV cameras in and around some of our sites for security purposes and the protection of staff, trustees, volunteers, and other stakeholders.

While the majority of information we collect about Trustees is mandatory, there is some information that may be provided voluntarily.

Whenever we seek to collect information, we will make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying. If you fail to provide certain information when requested, we may be prevented from complying with our official or legal obligations

4. Why we collect and process personal data.

The Trust collects information to safeguard our users, promote the objects and interests of the Trust, facilitate efficient operations, and ensure that all relevant legal obligations are complied with. For example, we collect data to:

- establish and maintain effective governance, including training and other records.
- meet statutory obligations for publishing and sharing the trustee's details.
- facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- undertake equalities monitoring.
- ensure that appropriate access arrangements can be provided for those who require them.
- Provide a safe working environment, minimise risk and safeguard all stakeholders

5. Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make decisions without human intervention. We are permitted to use automated decision-making in limited circumstances.

We **do not** envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

6. The Lawful Bases on which we Process Personal Data

We only collect and use personal data when the law and our policies allow us to do so. We process general category data where:

- the data subject, or a person with the lawful authority to exercise consent on the data subject's behalf, has given consent.
- the processing is necessary for a contract we have with you, or because it is necessary to take steps before entering into a contract with you.
- the processing is necessary for us to comply with a legal obligation.
- the processing is necessary to protect your vital interest or that of another person.
- the processing is necessary for us to perform a task in the public interest or for our official functions, and this task or function is lawful.

We process special category data where:

- the data subject, or a person with the lawful authority to exercise consent on the data subject's behalf, has given explicit consent.
- the processing is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent.
- the processing relates to personal data which are manifestly made public by the data subject.
- the processing is necessary for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity.
- the processing is necessary for reasons of substantial public interest, based on domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.
- processing is necessary for reasons of public interest in the area of public health, on the basis of domestic law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular, professional secrecy.
- the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds that justify our use of this data.

7. Criminal Proceedings/Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our legal and safeguarding obligations and provided we do so in line with data protection legislation.

We envisage that we will hold information about criminal convictions, for example, if information about criminal convictions comes to light as a result of our Disclosure and Barring Service checks, or if information about criminal convictions comes to light during your time as a Trustee with the Trust.

Where appropriate and lawful, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and/or the Police.

Such information will only be processed to the extent that it is lawful to do so, and appropriate measures will be taken to keep the data secure.

8. CCTV

CCTV is used at some of our sites. The purpose of the system is to prevent crime and promote security and public safety.

If in the event of viewing CCTV for the specified purpose, a safeguarding or criminal action is observed, the CCTV images can and may be used to support any subsequent investigation.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

CCTV images are retained for a maximum of 30 days. After this period images will be permanently deleted unless they are required and retained for an ongoing investigation. For example, if an incident or crime has been recorded. In such cases, the images will be retained until the conclusion of any actions or criminal proceedings arising from the incident.

Any enquiries about the CCTV system should be directed to office@thesycamoretrust.co.uk

9. Consent

We may process personal information without your consent, in compliance with the above lawful bases (section 6), where this is required or permitted by law and our policies.

We will ask for consent to process general personal data where there is no other lawful basis for processing it. For example, where we wish to use your photographs on our website or social media channels for promotional/marketing purposes.

In limited circumstances, we may approach you for your written consent to allow us to process 'special category' data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Where we rely solely on consent as the lawful basis for processing, that consent may be withdrawn at any time.

10. Change of Purpose

We will only use your personal information for the purposes for which it was collected unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so, or seek your consent if necessary before the processing commences.

11. Storage and Retention of Personal Data

A significant amount of personal data is stored electronically. Some information may also be stored as hard copy.

All data is stored and accessed following the Trust's ***Data Security Policy***

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, insurance or reporting requirements.

Details of retention periods for different aspects of your personal information are available in our ***Data Retention Schedule.***

When your time as a Trustee at the Trust comes to an end, we will retain and securely destroy your personal information following our ***Data Retention Schedule***.

12. Sharing Personal Data

We do not share Trustee's personal data with anyone without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law), we routinely share personal data with:

- The Local Authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education - to fulfil our statutory reporting requirements.
- Companies House
- The public via the Trust/School Website

Department for Education
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 (DfE) under the requirements set out in the Academies Financial Handbook.

Local Authority
We are required to share information about our Trustees with our local authority (LA) under the requirements set out in the Academies Financial Handbook.

We may occasionally also share personal data with:

- Disclosure & Barring Service
- Our regulators [e.g., Ofsted]
- Central and local government
- Police forces or other law enforcement agencies, courts, tribunals
- Trade unions and associations
- Your family or representatives
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Professional bodies

Third-party service providers
Limited personal data is shared with third-party service providers who require access to the data to deliver contracted services. These service providers include: -

- Professional advisers and consultants
- Payroll (payment of expenses)

- Legal advisors and Insurance providers
- IT providers
- Any other third-party service provider we will inform you of from time to time

These third-party service providers act as data processors on the Trust's behalf and are required to take appropriate security measures to protect your personal information in line with our policies and data protection legislation.

We authorise these service providers to use personal data only as necessary to perform services on our behalf, or to comply with legal obligations if necessary.

13. Transferring Data Outside The UK

We do not routinely share data with organisations outside the UK. We will not transfer personal data outside the UK unless such transfer complies with the UK GDPR. This means that we cannot transfer any personal data outside the UK unless:

- The Secretary of State has decided that another country or international organisation ensures an adequate level of protection for personal data
- One of the derogations in the UK GDPR applies (including if an individual explicitly consents to the proposed transfer).

14. Data Security

We have put in place appropriate organisational and technological security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those staff, consultants, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

15. Your Data Subject Rights

You have the right to:

- Make a Subject Access Request (SAR) (see below)
- Withdraw your consent to processing based solely on consent, at any time
- Ask us to rectify, erase or restrict the processing of your personal data, or object to the processing of it (in certain circumstances)
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified based on public interest
- Request a copy of agreements under which your personal data is transferred outside of the UK
- Object to decisions based solely on automated decision-making or profiling. The Trust ***does not use*** automated decision-making and/or profiling in any of its processes and procedures
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO

- Ask for personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

For more information about your data subject rights please see here.

Your Duty to Inform us of Changes

The personal information we hold about you must be accurate and current. Please keep us informed if your personal information changes during your time with us.

Subject Access Requests

Under data protection legislation, individuals have the right to request access to their personal data held by the Trust Subject Access Requests ***may be*** made in writing or verbally.

Subject Access Requests may be made in writing or verbally. If you would like to make a SAR concerning your personal data it would be helpful if this could be made in writing to the Trust, including:

- name and contact address
- email address and telephone number
- details of the information required.

Fulfilling A Subject Access Request

The lawful time scale for the Trust to respond to a Subject Access Request is one calendar month from receipt of a '**valid**' SAR.

A SAR is only considered '***valid*** when we are fully satisfied with the identity of the requester and their entitlement to the data requested. If in any doubt we will request confirmation of identity to ensure personal data is not inadvertently released to a third party who is not entitled to it.

The Trust has limited administrative resources outside of term time, we encourage all stakeholders to submit Subject Access Requests during term time and to avoid sending a SAR just before or during term breaks. This will assist us in responding to your request as promptly as possible.

If the SAR is complex or numerous, the period in which we must respond may be extended by a further two months. You will be notified of any delays in actioning the SAR and provided with a timeframe in which you can expect to receive the requested data.

Fees

You will ***not*** have to pay a fee to access your personal information (or to exercise any of your other data subject rights). However, we may charge a reasonable fee if your access request is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Exercising Other Data Subject Rights

If you wish to review, verify, correct or request the erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Trust in the first instance (details below).

The Right to Withdraw Consent

Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, and there is no other applicable lawful basis for

processing the data, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Trust directly.

Once we have received 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 lawful basis for doing so.

16. 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 concerns about our data processing, please raise this with us in the first instance. We will acknowledge your concern within 30 days and will respond without undue delay.

If you have any concerns that we are not able to resolve to your satisfaction, you can contact our Data Protection Officer at the address below

Alternatively, you can register your concern with the UK's data protection regulator - the Information Commissioner's Office:

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

17. 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**:

Data Protection Officer : Shard Business Services
Email: DPO@Shardbusinessservices.co.uk

Data Controller: The Sycamore CE Trust
Email: office@thesycamoretrust.co.uk
Phone: 0161 723 1078 (option 3)
Address: C/o Christ Church CofE Primary School
Church Street, Walshaw, Bury, BL8 3AX

Data Controllers Representative: Ian Young
Email: office@thesycamoretrust.co.uk

Changes to this Privacy Notice
This Notice will be reviewed annually or as necessary in response to changes in Data Protection legislation or our processing activity.

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information.

Effective Date:	May 2018
Last update:	January 2026
Review Date:	January 2027

How the Government uses your data

The governance data that we lawfully share with the DfE via GIAS:

- will increase the transparency of governance arrangements
- will enable maintained schools and academy trusts and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allows the department 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

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

Note: Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff 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 unless the law allows it.

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- 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, you should make a 'Subject Access Request'. Further information on how to do this can be found within the Department's 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