

# The Four Stones Multi Academy Trust

## Privacy notice for Members, Trustees and Governors

### Version Control

**Policy author:** Philip Engleheart  
**Policy approved by:** Trust Board  
**Next policy review date:** Autumn 2022

Version	Date	Details
1.0	20 May 2019	Privacy notice written to reflect the formation of The Four Stones MAT
2.0	25 Nov 2020	Updates to reflect nomenclature changes and additional GIAS requirements
3.0	1 Sept 2021	DPO information update

Under data protection law, individuals have a right to be informed about how The Four Stones Multi Academy Trust (MAT) 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 personal data about individuals who hold office at all levels of the MAT's governance. The MAT is the 'data controller' for the purposes of data protection law. Our data protection officer (DPO) is Jess Hathaway (see 'Contact us' below).

The tables at **Appendix A** list the information held and/or processed by the MAT and its constituent schools relating to current and former Trust Members, Trustees and LGB Governors, including that which is required by law to be published and/or made available to statutory agencies. The information is retained in accordance with the retention guidelines issued by the Information and Records Management Society of Great Britain (IRMS) 'Retention Guidelines for Schools' (<https://irms.org.uk/page/SchoolsToolkit>). Please see the MAT's 'Data Protection' policy for further details. The forms for consent to internal data sharing within the Trust Board and LGBs are shown as **Appendices B and C**.

### How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the MAT holds about them. If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

### Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- To exercise any of these rights, please contact our data protection officer.

## 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 concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact our data protection officer. Alternatively, you can make a complaint to the Information Commissioner's Office:

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

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

- Philip Engleheart is the Clerk to the Trustees and Company Secretary, contactable on [pengleheart@thefourstonesmat.co.uk](mailto:pengleheart@thefourstonesmat.co.uk)
- Jess Hathaway is the data protection officer for the MAT, contactable on [dpo@thefourstonesmat.co.uk](mailto:dpo@thefourstonesmat.co.uk) or at King Charles I School on 01562 512880

## Information held and/or processed by the MAT and its constituent schools relating to current and former Trust Members, Trustees and LGB Governors

<b>MEMBERS</b>			
Category	Content	Who has access	Retention period
<b>Information held securely by the clerk to the Trust Board</b>	<ul style="list-style-type: none"> <li>• Home address</li> <li>• Telephone number(s)</li> <li>• Email address(es)</li> </ul>	Clerk to Trust Board/Company Secretary and Chief Executive Officer (CEO)	During Trust Membership and then as per IRMS retention guidelines, after which all contact details will be deleted unless there is specific written or emailed consent for any to be kept by the MAT
<b>Information held on the MAT section of the single central record (SCR) for safeguarding at Haybridge High School (the MAT's registered office address)</b>	<ul style="list-style-type: none"> <li>• Details of criminal records certificate issued by the Disclosure and Barring Service (DBS), or where applicable by the former Criminal Records Bureau (CRB)</li> </ul>	CEO, PA to the CEO, Headteacher at Haybridge High School, Designated Safeguarding Lead at Haybridge High School, Lead HR admin manager and HR Consultant	A list of proof of identity documents seen and DBS numbers are recorded. No copies of DBS certificates are kept by the Trust. Notes are deleted after 12 months after Membership ceases
<b>Information required to be published on the Trust website</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• By whom Member was appointed</li> <li>• When appointed</li> <li>• Current entries in the register of business, pecuniary and governance interests</li> </ul>	Public	While current, with a separate section for those who have ceased to be Members during the last 12 months
<b>Information published in the Trustees' annual report (for those who were Members at any time during the reporting year, and subsequently up until the time of publication)</b>	<ul style="list-style-type: none"> <li>• Name</li> </ul>	Public (on the Trust's website and Companies House website)	Permanently in the public domain
<b>Information required to be posted in the DfE's online 'Get Information about Schools' (GIAS)</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• By whom Member was appointed</li> <li>• When appointed</li> <li>• Email address** (<i>for all Members, this will be their Four Stones MAT address</i>)</li> </ul>	Public ( <i>except for those details marked** which are for use of DfE staff only and are not publicly viewable</i> )	While current, with a separate section for those who have ceased to be Members during the last 12 months; thereafter removed automatically

**TRUSTEES**

Category	Content	Who has access	Retention period
<b>Information held securely by the clerk to the Trust Board</b>	<ul style="list-style-type: none"> <li>• Home address</li> <li>• Telephone number(s)</li> <li>• Email address(es)</li> </ul>	Clerk to Trust Board/Company Secretary, CEO and PA to the CEO  Other Trustees, subject to individual consent in a signed form (Appendix B)	During office as Trustee and then as per IRMS retention guidelines, after which all contact details will be deleted unless there is specific written or emailed consent for any to be kept by the MAT
<b>Information held on the MAT section of the single central record (SCR) for safeguarding at Haybridge High School (the MAT's registered office address)</b>	<ul style="list-style-type: none"> <li>• Details of criminal records certificate issued by the Disclosure and Barring Service (DBS), or where applicable by the former Criminal Records Bureau (CRB)</li> </ul>	CEO, PA to the CEO, Headteacher at Haybridge High School, Designated Safeguarding Lead at Haybridge High School, Lead HR admin manager and HR Consultant	A list of proof of identity documents seen and DBS numbers are recorded. No copies of DBS certificates are kept by the Trust. Notes are deleted after 12 months after trusteeship ceases
<b>Other information held by the MAT central office</b>	<ul style="list-style-type: none"> <li>• References as to suitability and character for newly appointed Trustees</li> </ul>	Chair of the Trust Board, CEO, PA to the CEO, Lead HR admin manager and HR Consultant	During office as Trustee
<b>Information required by law to be published on the school website</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• By whom Trustee was appointed</li> <li>• When appointed; when term of office will end</li> <li>• Roles on Trust Board</li> <li>• Current entries in the register of business, pecuniary and governance interests</li> <li>• Record of attendance at Trust Board and committee meetings during the previous academic year</li> </ul>	Public	While current, with a separate section for those who have ceased to be Trustees during the last 12 months
<b>Information published in the Trustees' annual report (for those who were Trustees at any time during the reporting year, and subsequently up until the time of publication)</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Main offices held on the Trust Board and its committees</li> <li>• Record of attendance at Trust Board and committee meetings during the previous academic year</li> </ul>	Public (on the Trust's website and Companies House website)	Permanently in the public domain

<b>Information required to be posted in the DfE's online 'Get Information about Schools' (formerly EduBase)</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• By whom Trustee was appointed</li> <li>• When appointed; when term of office will end</li> <li>• Email address** (<i>for all Trustees, this will be their Four Stones MAT address</i>)</li> <li>• Mobile phone number** (chair of Trustees only)</li> </ul>	Public ( <i>except for those details marked** which are for use of DfE staff only and are not publicly viewable</i> )	While current, with a separate section for those who have ceased to be Trustees during the last 12 months; thereafter removed automatically
<b>Information about company directors (coterminous with academy Trustees) required by law to be filed at Companies House</b>	<ul style="list-style-type: none"> <li>• Full names</li> <li>• Date of birth (only year/month shown publicly)</li> <li>• Correspondence address (= the Trust's registered office)</li> <li>• Home address**</li> <li>• Date of appointment as director</li> <li>• Date of resignation (where applicable)</li> <li>• Nationality</li> <li>• Country of residence</li> <li>• Occupation</li> </ul>	Public ( <i>except for those details marked** which are not viewable</i> )	Information on current and former directors of live companies remains indefinitely on the Companies' House website. For companies that have been wound up this information remains for 20 years.

**GOVERNORS ON LOCAL GOVERNING BODIES (LGBs)**

<b>Category</b>	<b>Content</b>	<b>Who has access</b>	<b>Retention period</b>
<b>Information held securely by the clerk to the LGB</b>	<ul style="list-style-type: none"> <li>• Home address</li> <li>• Telephone number(s)</li> <li>• Email address(es)</li> </ul>	<p>Clerk to LGB. Made available as needed to the relevant Headteacher</p> <p>Other members of the LGB and SLT members who support the LGB and its committees, subject to individual consent in a signed form (Appendix C)</p>	During governorship and then as per IRMS retention guidelines, after which all contact details will be deleted unless there is specific written or emailed consent for any to be kept by the school
<b>Information held in the relevant school's single central record (SCRs) for safeguarding</b>	<ul style="list-style-type: none"> <li>• Details of criminal records certificate issued by the Disclosure and Barring Service (DBS), or where applicable by the former Criminal Records Bureau (CRB)</li> </ul>	CEO, PA to the CEO, relevant Headteacher, relevant Designated Safeguarding Lead, relevant HR admin manager and HR Consultant	A list of proof of identity documents seen and DBS numbers are recorded. No copies of DBS certificates are kept by the school. Notes are deleted after 12 months after governorship ceases.
<b>Information displayed in school reception areas (for current governors)</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Capacity in which governor serves</li> </ul>	Public	Only so long as current
<b>Information required by law to be published on the school website</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Capacity in which governor serves</li> <li>• By whom governor was appointed</li> <li>• When appointed; when term of office will end</li> <li>• Roles on governing body</li> <li>• Current entries in the register of business, pecuniary and governance interests</li> <li>• Record of attendance at LGB meetings during the previous academic year</li> </ul>	Public	While current, with a separate section for those who have ceased to be governors during the previous 12 months
<b>Information required by law to be posted in the DfE's online 'Get Information about Schools' (formerly EduBase) for academy trust members and governors / trustees</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• By whom governor was appointed</li> <li>• When appointed; when term of office will end</li> </ul>	Public	While current, with a separate section for those who have ceased to be governors during the previous 12 months; thereafter removed automatically

# The Four Stones Multi Academy Trust Trust Board

## CONSENT FORM FOR INTERNAL DATA SHARING

<b>Name:</b>	
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**Internal sharing of contact details within the Trust**

You have provided the following information to the clerk. Please indicate, by ticking below, the level of accessibility you agree to for the potential users shown:

	Clerk to the Trust Board and Trust office	Other Trustees	Trust staff who support the Board and committees
<b>Correspondence address:</b>	✓		
<b>Home landline:</b>	✓		
<b>Work landline:</b>	✓		
<b>Mobile tel:</b>	✓		
<b>Email 1:</b>	✓		
<b>Email 2:</b>	✓		
<b>Email 3:</b>	✓		

In all other instances where contact information is requested, this will only be given after specific consent has first been obtained from the individual trustee(s). Correspondence and emails (apart from obvious advertising material or circulars) will be forwarded as needed to Trustees by the clerk, and it will then be for the Trustees concerned to deal with these as they see fit.

**Please sign, date and return to the Clerk to the Trust Board.**

**Signed:** ..... **Date:** .....

**The Four Stones Multi Academy Trust**  
**..... School**  
**Local Governing Body**

**CONSENT FORM FOR INTERNAL DATA SHARING**

<b>Name:</b>	
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**Internal sharing of contact details within the school and LGB**

You have provided the following information to the clerk. Please indicate, by ticking below, the level of accessibility you agree to for the potential users shown:

	Clerk to the LGB and school office	Other governors	SLT staff who support the LGB
<b>Correspondence address:</b>	✓		
<b>Home landline:</b>	✓		
<b>Work landline:</b>	✓		
<b>Mobile tel:</b>	✓		
<b>Email 1:</b>	✓		
<b>Email 2:</b>	✓		
<b>Email 3:</b>	✓		

In all other instances where contact information is requested, this will only be given after specific consent has first been obtained from the individual governor(s). Correspondence and emails (apart from obvious advertising material or circulars) will be forwarded as needed to governors by the clerk, and it will then be for the governors concerned to deal with these as they see fit.

**Please sign, date and return to the Clerk to the LGB.**

**Signed:** ..... **Date:** .....