ACHIEVING TOGETHER

FOUR STONES GATEWAY TRUST

PRIVACY NOTICE FOR MEMBERS, TRUSTEES & GOVERNORS

DATE POLICY WAS APPROVED	30.04.2025
DATE POLICY WILL BE REVIEWED	SPRING 2027
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW	Head of IT Services

Key Definitions

All policies incorporate the following schools or organisations within Four Stones Gateway Trust ('the Trust'):

- Clee Hill Community Academy
- Cleobury Mortimer Primary School
- Haybridge High School and Sixth Form
- Haybridge Teaching School Hub
- Haybridge SCITT
- King Charles I School
- Lacon Childe School
- SHaW (Shropshire, Herefordshire and Wolverhampton) Maths Hub
- Stottesdon CofE Primary School
- TDMS (The De Montfort School)
- Any other schools or organisations that may join the Trust from time to time and not listed above.

The terms Academy, School, Organisation and Trust are considered interchangeable in the context of all Trust policies.

Where appropriate, in this policy the term:

"CEO" includes the Chief Executive Officer

"CFOO" includes the Chief Financial Officer

"Trust Senior Leadership Team" includes Executive Headteachers, Headteachers, strategic operational leads and Teaching School/SCITT Directors.

"Headteacher" includes the appropriate School Headteacher.

"Trustees or Trust Board" are appointed Trustees who oversee the business of Four Stones Gateway Trust, agreeing the overarching strategic direction and ensuring robust governance.

"Local Academy Boards (LAB)" are appointed Governors at a local level associated with the Trust's Worcestershire Schools. LAB Governors act as advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Local Governing Bodies (LGB)" are appointed Governors at a local level associated with the Trust's Shropshire Schools. LGB Governors are advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Chair" responsible for leading the board and ensuring its effectiveness

"Stakeholders" are any individuals or companies who are invested in the welfare and success of the Trust and/or School and its students, including staff members, students, parents, community members, LAB, LGB or Trust members, trade unions, local business leaders etc.

Purpose of this Privacy Notice
The Data Protection Act 2018 (UKGDPR) provides individuals with the right to be informed about how their information is used by organisations.

This Privacy Notice explains how Four Stones Gateway Trust (the Trust) uses information about individuals who represent the Trust in any governance role. If you can be identified from the information we hold, then this is known as "personal data."

This Privacy Notice explains:

- why we use your personal data.
- the reasons we need to do this.
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- your information rights
- who to contact if you need more information or have a concern.

Four Stones Gateway Trust is the 'data controller' for the purposes of data protection law.
The Trust is registered with the Information Commissioners Office: ZA521971

The tables in Appendix A list the information held and/or processed by the Trust and its constituent schools relating to current and former Trust Members, Trustees and LAB/LGB Governors, including that which is required by law to be published and/or made available to statutory agencies. Please see the Trust 'Data Protection' policy for further details.

The forms for consent to internal data sharing within the Trust Board and LAB/LGBs are shown as **Appendices B** and **C**.

The personal data we hold
We process data relating to individuals who represent the Trust in any governance role. Personal data that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Governance details (such as role, start and end dates and governor id)
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

We may also collect, use, store, and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements
- Photographs and CCTV images captured in our schools

We may also collect, use, store, and share (when appropriate) information about criminal convictions and offences.
We may also hold data about you that we have received from other organisations, including the Local Authority, other schools and the Disclosure and Barring Service in respect of criminal offence data.

Our lawful basis for using this data
The personal data we collect from you is necessary for Four Stones Gateway Trust to perform official functions and statutory duties in relation to governance.
Under the UK General Data Protection Regulation (UK GDPR), the Trust is responsible for identifying the lawful basis we rely on for processing personal information.

We process the personal data of our Members, Trustees and Governors where the following conditions apply:

- Article 6, 1, (c) processing is necessary for compliance with a legal obligation to which the controller is subject.
- Article 6,1, (e) processing is necessary for the performance of a task carried out in the public interest.
- or in the exercise of official authority vested in the controller

These include the following legislation or statutory guidance:

- Education Act 2011
- Keeping Children Safe in Education
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009

Less commonly, we may also use personal information about you where you have given us consent to use it in a certain way.

Where this is the case, we process your personal data under the following lawful basis:

- Article 6, 1, (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Our basis for using special category data
Where we collect sensitive, or 'special category' data, we have identified both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

- Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

Collecting this information
We collect personal information via data collection sheets, governor contact forms.

Governance roles data is essential for the Trust's operational use. Whilst most personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. To comply with UKGDPR, 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.

How we store this data
Personal data is stored in line with the Trust's records management policy and procedure. This policy is based on retention guidance published by the Information Records Management Society (IRMS) in their toolkits for schools and academies.

In accordance with UKGDPR, the Trust does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Data sharing
We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

We are required to share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the Academies Financial Handbook academy trust handbook

We are also required under the Companies Act 2006 to submit the names and contact details of Trust Members and Trustees to Companies House, as part of our filing obligations as a company registered as a charity.

All governors data is entered manually on the GIAS service and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework. For more information, please see 'How Government uses your data' section.

Your personal data is also shared with the providers of services used to support the Trust. This includes where your name and contact information is needed by the Local Authority for the purposes of managing panels and meetings requiring governor/trustee participation. Your contact information may also be shared with Services4Schools Ltd if you are required to support with Audit processes and matters of compliance/GDPR.

Use of your personal data for marketing purposes
Where you have given, us consent to do so, we may send you marketing information by email or text promoting Trust and school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

We may also you your image in newsletters, posts, and other communications relating to Trust and school activities, which may be published on our websites and social media channels

Use of your personal data in automated decision making and profiling
We do not currently process any governance representative's personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

How the Government uses your data
The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- increase the transparency of governance arrangements
- enable local authority-maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow the Department for Education (DfE) 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 (DfE) including the data that we share with them, go to National database of governors

Some of these personal data items are not publicly available and are encrypted within the GIAS system.

Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) account who need to see it to fulfil their official duties. The information is for internal purposes only and not shared beyond the Department for Education (DfE) unless the law allows it.

How to find out what personal information the Department for Education (DfE) hold about you
Under the terms of the Data Protection Act 2018, you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data, they hold about you.
- the reasons they are 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 for Education (DfE), you should make a subject access request (SAR). Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:
Personal information charter - Department for Education - GOV.UK
To contact DfE: https://www.gov.uk/contact-dfe

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

Transferring data internationally
Where we are required to transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Your Information Rights
Data Protection law provides you with certain rights.

Requesting access to your personal data
You (or an authorised official representative) have the right to request access to information about you that we hold.
If we do hold information about you, we will:

- Give you a description of it.
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information.

To make a request to access your personal information, please contact our Data Protection Officer by emailing DPO@fourstonesgateway.org.uk

or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

When making a request you should confirm:

- The types of records you wish to access.
- any date periods these relate to

Please address letters: For the attention of the Data Protection Officer.
We may require you to provide proof of your identity before we can comply with your request.

Your Other Information Rights:

- **The right to know how your information is being used** – We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking you to review the information we hold on record and updating information if you provide evidence to show it has changed
- **The right to have information removed or deleted from your records** – We uphold this right by removing or deleting your information that we are no longer required to keep
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so
- **The right to object to us using your data for certain purposes** – We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics)
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI**) – We uphold this right by letting you know if these systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact
The Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is responsible for helping individuals uphold their information rights.
You can contact our Data Protection Officer by emailing: DPO@fourstonesgateway.org.uk,
or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

Please address letters: For the attention of the Data Protection Officer.

Complaints or Concerns
If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance. You can also raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

APPENDIX A

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

MEMBERS			
Category	**Content**	**Who has access**	**Retention period**
Information held securely by the Head of Governance / Governance Professional	▪ Home address ▪ Telephone number(s) ▪ Email address(es)	▪ Company Secretary ▪ CEO ▪ Executive Assistant	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 Trust.
Information held on the Trust section of the single central record (SCR) for safeguarding at Haybridge High School	Details of criminal records certificate issued by the Disclosure and Barring Service (DBS)	▪ CEO ▪ Headteacher at HHS ▪ DSL at HHS ▪ HR admin manager	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
Information required to be published on the Trust website	▪ Name ▪ By whom Member was appointed ▪ When appointed ▪ Current entries in the declaration of interests	Public	While current, with a separate section for those who have ceased to be Members during the last 12 months
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)	Name	Public (on the Trust's website and Companies House website)	Permanently in the public domain
Information required to be posted in the DfE's online 'Get Information about Schools' (GIAS)	▪ Name ▪ By whom Member was appointed ▪ When appointed ▪ Email address** *(for all Members, this will be their Four Stones Gateway address)*	Public *(except for those details marked** which are for use of DfE staff only and are not publicly viewable)*	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**
Information held securely by the Head of Governance / Governance Professional	▪ Home address ▪ Telephone number(s) ▪ Email address(es)	▪ Company Secretary ▪ CEO ▪ Executive Assistant ▪ 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 Trust.
Information held on the Trust section of the single central record (SCR) for safeguarding at Haybridge High School	Details of criminal records certificate issued by the Disclosure and Barring Service (DBS)	▪ CEO ▪ Headteacher at HHS ▪ DSL at HHS ▪ HR Team	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
Other information held by the Trust central office	References as to suitability and character for newly appointed Trustees	▪ Chair of Trustees ▪ CEO ▪ Company Secretary ▪ HR	During office as Trustee
Information required by law to be published on the Trust website	▪ Name ▪ By whom Trustee was appointed ▪ When appointed, when term of office will end ▪ Roles on Trust Board ▪ Current entries in the register of business, pecuniary and governance interests ▪ Record of attendance at Trust Board and committee meetings during the previous academic year	Public	While current, with a separate section for those who have ceased to be Trustees during the last 12 months
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)	▪ Name ▪ Main offices held on the Trust Board and its committees ▪ Record of attendance at meetings during the previous academic year	Public (on the Trust's website and Companies House website)	Permanently in the public domain
Information required to be posted in the DfE's online 'Get Information about Schools'	▪ Name ▪ By whom Trustee was appointed ▪ When appointed, when term of office will end	Public	While current, with a separate section for those who have ceased to be Trustees during the last 12 months; thereafter removed automatically

	▪ Correspondence address (c/o The Trust)		
Information about company directors (coterminous with academy Trustees) required by law to be filed at Companies House	▪ Full names ▪ Date of birth (only year/month shown publicly) ▪ Correspondence address (c/o the Trust ▪ Home address** ▪ Date of appointment as director ▪ Date of resignation (where applicable) ▪ Nationality ▪ Country of residence ▪ Occupation	Public *(except for those details marked** which are not viewable)*	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 ACADEMY BOARDS (LAB) or LOCAL GOVERNING BODIES (LGB)			
Category	**Content**	**Who has access**	**Retention period**
Information held securely by the clerk to the LAB/LGB.	▪ Home address ▪ Telephone number(s) ▪ Email address(es)	▪ Governance Team ▪ Company Secretary ▪ Executive Assistant ▪ Made available as needed to the relevant Headteacher ▪ Other members of the LAB/LGB & SLT members who support the LAB/LGB subject to individual consent in a signed form (Appendix C)	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
Information held in the relevant school's single central record (SCRs)	Details of criminal records certificate issued by the Disclosure and Barring Service (DBS)	▪ CEO ▪ Headteacher at HHS ▪ DSL at HHS ▪ HR admin	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.
Information displayed in school reception areas (for current governors)	▪ Name ▪ Capacity in which governor serves	Public	Only so long as current
Information required by law to be published on the school website	▪ Name ▪ Capacity in which governor serves ▪ By whom governor was appointed ▪ When appointed, when term of office will end ▪ Roles on governing body ▪ Current entries in the register of business, pecuniary and governance interests ▪ Record of attendance at LAB/LGB meetings during the previous academic year	Public	While current, with a separate section for those who have ceased to be governors during the previous 12 months
Information required by law to be posted in the DfE's online 'Get Information about Schools'	▪ Name ▪ By whom governor was appointed ▪ When appointed, when term of office will end	Public	While current, with a separate section for those who have ceased to be governors during the previous 12 months; thereafter removed automatically

APPENDIX B

Four Stones Gateway Trust.
Trustee / Member

CONSENT FORM FOR INTERNAL DATA SHARING

Name:	
Date:	

Internal sharing of contact details within the Trust

Please provide information below to the Governance Team.
Please indicate, by ticking, the level of accessibility you agree to for the potential users shown:

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

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 Governance Team, and it will then be for the Trustees concerned to deal with these as they see fit.

Please return to governance@fourstonesgateway.org.uk

APPENDIX C

Four Stones Gateway Trust
Local Academy Board or Local Governing Body. Governor

CONSENT FORM FOR INTERNAL DATA SHARING

Name	
Date	

Internal sharing of contact details within the school and other governors

Please provide information below to the Governance Team.
Please indicate, by ticking, the level of accessibility you agree to for the potential users shown:

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

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 return to governance@fourstonesgateway.org.uk