Privacy Notice for Members/Trustees/Governors/ LGB Members/Other Volunteers How we use your information 2026/2027

Who are we?
Castle Phoenix Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Castle Phoenix Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z6078008.

You can contact the Academy Trust as the Data Controller in writing at:
Castle Phoenix Trust, Axholme Road, Coventry. CV2 5BD or enquiries@castlephoenixtrust.org.uk

What is a Privacy Notice?
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our Governors/Trustees and other volunteers.

What is Personal Information?
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about Members/Trustees/Governors/LGB Members and other volunteers?
The categories of Members/Trustees/Governors/LGB Members and other volunteers' information that we collect, hold and share include:

- Personal information such as name, any former names, address, date of birth, occupation, nationality, telephone and email contact details
- Records of Business and Pecuniary Interests
- Information from your References
- Evidence of any relevant qualifications
- Disclosure and Barring Service Certificate number and start date
- Self assessment skills audit
- Personal profiles provided for Trust/School website
- Photographs

We may also collect, use, store and share (when appropriate) information that falls into "special Categories" of more sensitive personal data. This includes:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements.
- Information relating to criminal convictions and offences.
- Photographs and CCTV footage captured in school.

We may also hold data about that 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.

For what purposes do we use personal information?

We use Member/Trustee/Governor/LGB Member and other volunteers' data to:

- Establish good governance
- Fulfill statutory obligations
- Facilitate safe recruitment, as part of our safeguarding obligations.
- Undertake equalities monitoring
- Communicate relevant information to individuals or groups or Boards or Local Governing Bodies for the purpose of them carrying out their roles and responsibilities as a Member/Trustee/Governor/LGB Member/other volunteer.
- Ensure that appropriate access arrangements can be provided to volunteers who require them.

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 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 contacting us (see 'Contact us' below).

Use of your personal data in automated decision making and profiling

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

Collecting Member/Trustee/Governor/LGB Member and other volunteers information
Whilst the majority of Member/Trustee/Governor/LGB Member and other volunteers information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulations, we will inform you whether you are required to provide certain Member/Trustee/Governor/LGB Member and other volunteers information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

1) To comply with the law

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that Members/Trustees/Governors/LGB Members and other volunteers receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that Members/Trustees/Governors/LGB Members and other volunteers are properly supported and able to do their job.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject
2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
3) Processing relates to personal data which is manifestly made public by the data subject
4) Necessary for establishing, exercising or defending legal claims
5) Necessary for reasons of substantial public interest
6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
7) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

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

Who might we share your information with?

We routinely share Member/Trustee/Governor/LGB Member and other volunteers' information with:

- Local Authorities
- Government departments and agencies
- Companies House (Member/Trustees only)
- Academy Trust Members and Trustees (Members/Trustees/Local Governing Body Members and other volunteers)
- Local Governing Bodies (Local Governing Body Members)
- Our regulator
- Suppliers and service providers – e.g., HR, Catering, Training
- Our Auditors
- Health authorities
- Security organisations
- Professional advisors and consultants
- Charities and Voluntary Organisations
- Law enforcement officials, e.g., police, courts , tribunals

We do not share information about our Members/Trustees/Governors/LGB Members and other volunteers unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

International Data Transfers

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

What do we do with your information?
All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?
In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:

http://irms.org.uk/page/SchoolsToolkit

What are your rights with respect of your personal information?

Under data protection law, Members/Trustees/Governors/LGB Members and other volunteers have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

Please ensure you specify which school your request relates to.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations
- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a complaint about how your data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This allows us to investigate and resolve the issue as quickly as possible.

- Trust DPL Email: emma.phillips@castlephoenixtrust.org.uk
- School/Trust DPO: Schooldpo@warwickshire.gov.uk

When you contact us, please provide as much detail as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

What to Expect from us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:

- Keep you informed of our progress.

- Request any additional information we may need from you in a timely and proportionate manner.
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

The content of this Privacy Notice will be reviewed at the beginning of each academic year.

Data Tables:

The tables below set out the types of processing carried out by the school/Academy Trust and lawful reasons for doing do.

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory Requirement
Address	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory Requirement
Date of Birth	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory Requirement
Nationality	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory Requirement
Occupation	Companies Act 2006		Companies House	Statutory Requirement

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the	Lawful reason for sharing

		information	
Medical Information	Necessary for obligations under employment and social protection	Medical staff i.e. paramedics / ambulance	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'
Religious belief	Substantial Public Interest on the basis of UK Law.	Medical staff i.e. paramedics / ambulance	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Personal Profile		Public record on website	Consent of individual
Skills Audit		Not shared externally	Consent of individual

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task. You have the right to object or restrict processing that is carried out for the purposes of Public Task – However, please note that this is not an absolute right and would only apply in certain circumstances.

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name		Local Authority	Public Task (to establish email address on secure server)
Name		Public Record	Public Task (to comply with statutory guidance)
Personal Information (Address / Date of Birth / contact information)			
Record of Business Interest		Public record	Public Task (to comply with statutory guidance)

Table 6 - Personal information we process because we have a legitimate interest. Please note that the right to object will apply to *some* of this processing, please see the section above that refers to '*What are your rights with respect of your personal information?*'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a