



Four Hills
Education Trust

Where Every Step is Shaped with **CARE**

Privacy Notice for Members, Trustees and Governors

Version: 2.0

Effective Date: 01 September 2026

Review Date: September 2027

ICO Registration Number: ZB928089

1. Introduction

Four Hills Education Trust ("the Trust") is committed to protecting the privacy and security of personal information.

This Privacy Notice explains how we collect, use, store and share personal information relating to Members, Trustees and Governors and outlines your rights under UK data protection legislation.

This notice is provided in accordance with:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Data (Use and Access) Act 2025;
- Companies Act 2006;
- Charities Act 2011;
- Academy Trust Handbook;
- Funding Agreement requirements;
- other applicable education, charity and company legislation.

2. Data Controller

For data protection purposes, Four Hills Education Trust is the Data Controller.

Four Hills Education Trust

Address: % Millbrook Primary School & Nursery, Grainger Drive,
Leegomery, Telford, Shropshire, United Kingdom, TF1 6UJ

Telephone: 01952 387640

Email: Enquiries@fourhillseducationtrust.org.uk

Website: www.fourhillseducationtrust.org.uk

Four Hills Education Trust

Grainger Drive
Leegomery
Telford
TF1 6UJ

Telephone: 01952 387640

Email: admin@fourhillseducationtrust.org.uk

3. Data Protection Officer

The Trust has appointed a Data Protection Officer (DPO).

Data Protection Officer

Rob Montgomery / Sarah Daffern

Email: IG@telford.gov.uk

Telephone: 01952 383103

The DPO can provide advice regarding:

- data protection rights;
- subject access requests;
- privacy concerns;
- complaints;
- information sharing;
- data breaches.

4. Categories of Personal Information We Process

We may collect, use, store and share the following information:

Personal Information

- name;
- title;
- home address;
- correspondence address;
- email address;
- telephone numbers;
- date of birth;

- photograph (where applicable);
- signatures;
- emergency contact details.

Governance Information

- governance role;
- appointment dates;
- term of office;
- committee membership;
- attendance records;
- training records;
- skills audits;
- governor/trustee reference numbers;
- business and pecuniary interest declarations;
- related party declarations;
- governance correspondence and meeting records.

Suitability and Compliance Information

- identity verification documentation;
- declaration of eligibility;
- declaration of disqualification;
- safeguarding declarations;
- DBS information where applicable;
- statutory checks required for governance roles.

Financial Information

Where applicable:

- expense claims;
- reimbursement information;
- bank details;
- payment records.

Diversity and Equality Information

Where voluntarily provided:

- ethnicity;
- disability information;
- equality monitoring information.

5. Why We Use Your Information

We process personal information to:

- appoint, manage and administer governance roles;
- facilitate board and committee meetings;
- maintain governance records;
- communicate with trustees, governors and members;
- manage conflicts of interest;
- fulfil safeguarding obligations;
- assess suitability for governance positions;
- maintain statutory registers;
- provide governance training and development;
- comply with regulatory requirements;
- publish governance information required by law;
- respond to complaints, audits and investigations;
- support effective governance and strategic leadership of the Trust.

6. Lawful Basis for Processing

Under Article 6 UK GDPR, the Trust relies upon the following lawful bases:

Legal Obligation - Article 6(1)(c)

Processing is necessary to comply with legal obligations including:

- Companies House requirements;
- Charity Commission requirements;
- Academy Trust Handbook requirements;
- funding agreement obligations;
- safeguarding legislation;
- financial reporting obligations;
- audit requirements.

Public Task - Article 6(1)(e)

Processing is necessary for the performance of tasks carried out in the public interest and in the exercise of official authority vested in academy trusts.

This includes:

- governance activities;
- board administration;
- trustee decision-making;

- governance transparency;
- accountability arrangements.

Consent - Article 6(1)(a)

In limited circumstances we may request consent for specific uses of personal information.

Consent may be withdrawn at any time.

7. Special Category Personal Data

In certain circumstances we may process special category personal data including:

- ethnicity;
- disability information;
- health information;
- equality monitoring information.

Where this occurs, an Article 9 condition will also apply, including:

- Article 9(2)(a) Explicit Consent;
- Article 9(2)(g) Substantial Public Interest;
- Article 9(2)(b) Employment, Social Security and Social Protection purposes;
- Article 9(2)(c) Vital Interests.

Where required by law, the Trust maintains an Appropriate Policy Document.

8. Criminal Offence Data

The Trust may process criminal offence information where necessary to:

- undertake DBS checks;
- assess suitability for governance roles;
- comply with safeguarding duties;
- meet regulatory requirements;
- protect pupils, staff and visitors.

Such processing will only be undertaken where permitted by Article 10 UK GDPR and the Data Protection Act 2018.

9. How We Collect Information

Information may be obtained from:

- governance application forms;
- appointment documentation;
- declarations of interest;
- self-declarations;
- identity documents;
- the individual concerned;
- Companies House;
- Charity Commission;
- Department for Education;
- Disclosure and Barring Service;
- training providers;
- professional bodies;
- publicly available sources where lawful.

10. Is Providing Information Mandatory?

Most governance information is required in order for the Trust to:

- verify eligibility;
- fulfil legal obligations;
- maintain statutory records;
- comply with funding requirements;
- meet safeguarding obligations.

Where information is mandatory, failure to provide it may prevent appointment or continuation in a governance role.

Where information is optional, this will be made clear at the point of collection.

11. How We Store Information

The Trust stores information securely using appropriate technical and organisational measures.

These include:

- restricted access controls;
- password protection;
- secure cloud services;
- encryption where appropriate;
- secure disposal methods;
- staff confidentiality obligations;
- data sharing agreements;
- data processing agreements.

Access is restricted to authorised individuals who require information to perform their duties.

12. How Long We Keep Information

The Trust retains governance information in accordance with its Information Retention Schedule.

Retention periods are determined by:

- Companies Act requirements;
- Charity Commission requirements;
- Academy Trust Handbook requirements;
- safeguarding obligations;
- limitation periods for legal claims;
- recognised records management guidance.

Information will be securely deleted or destroyed when no longer required.

A copy of the Information Retention Schedule is available upon request.

13. Who We Share Information With

We may share information where lawful and necessary with:

- Department for Education;
- Get Information About Schools (GIAS);
- Companies House;
- Charity Commission;
- ESFA;
- auditors;
- solicitors;
- insurers;
- regulators;
- safeguarding agencies;
- local authorities where applicable;
- senior leaders;
- governance professionals and clerks;
- external investigators;
- professional advisers.

We only share information that is relevant, necessary and proportionate.

14. Publication of Governance Information

Certain governance information must be published to comply with legal and regulatory requirements.

This may include:

- names of Members, Trustees and Governors;
- governance structure;
- attendance information;
- trustee and governor interests;
- related-party transaction information;
- appointment and term dates;
- governance responsibilities.

Publication may occur through:

- the Trust website;
- annual reports and accounts;
- Companies House;
- Charity Commission records;
- Department for Education systems.

Publication is undertaken to meet legal obligations and public accountability requirements.

15. Data Processors

The Trust uses carefully selected third-party providers to support governance administration and IT services.

These may include:

- governance management systems;
- IT support providers;
- cloud storage providers;
- communication systems;
- training providers;
- document management platforms.

Where organisations process information on our behalf they are required to:

- act only on our instructions;
- maintain confidentiality;

- implement appropriate security measures;
- comply with UK GDPR;
- report data breaches;
- securely delete information when no longer required.

16. International Transfers

The Trust does not routinely transfer personal information outside the United Kingdom.

Where an international transfer is necessary, appropriate UK GDPR safeguards will be implemented before information is transferred.

17. Automated Decision-Making

The Trust does not make decisions about Members, Trustees or Governors solely through automated processing where the decision would have a legal or similarly significant effect.

18. Your Rights

Under UK GDPR you have the right to:

- be informed about how your information is used;
- access your personal information;
- request correction of inaccurate information;
- request deletion of information in certain circumstances;
- restrict processing in certain circumstances;
- object to processing in certain circumstances;
- request data portability where applicable;
- withdraw consent where consent is the lawful basis;
- challenge certain automated decisions.

Some rights are subject to legal exemptions and limitations.

19. Subject Access Requests

A request for access to personal information can be made verbally or in writing.

Requests should be sent to:

Email: admin@fourhillseducationtrust.org.uk

or directly to the Data Protection Officer:

Email: IG@telford.gov.uk

The Trust will normally respond within one calendar month.

20. Data Protection Complaints

If you are unhappy with how your personal information has been processed, you should raise your concern with the Trust in the first instance.

The Trust operates a Data Protection Complaints Procedure in accordance with its Data Protection Policy.

Complaints can be submitted to:

Chief Executive Officer

Four Hills Education Trust
Grainger Drive
Leegomery
Telford
TF1 6UJ

Email: Kirsty.osman@fourhillseducationtrust.org.uk

The Trust will acknowledge complaints and investigate them without undue delay in accordance with its published procedure.

21. The Information Commissioner's Office

If you remain dissatisfied following completion of the Trust's complaints process, you may complain to the Information Commissioner's Office.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk/make-a-complaint/

22. Changes to this Privacy Notice

The Trust reviews this notice annually and whenever there are significant changes to legislation, guidance, systems or processing activities.

The latest version will be available on the Trust website.