



**The Romero
Catholic Academy**
Nurturing the Talent of Tomorrow



Privacy Notice

Directors/ Local Governing Body/Other Volunteers

Responsible for policy: CC2 Strategy, People and Organisational Development
Policy status: Compliance
Policy review: Annually
Chair of Directors: *Sharon Fawcett*

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Definitions

In this **Directors and Local Governing Body Privacy Notice**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Parents and Pupils Privacy Notice** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer' or CEO** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the Governing Body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.
- xiv **'School DPO'** means the Data Protection Officer responsible for all schools within The Romero Catholic Academy (Warwickshire Legal Services)
- xv **'Volunteer'** a person who works for or on behalf of The Romero Catholic Academy without being paid.

1. Introduction

The Romero Catholic Academy is the **data controller** for the purposes of data protection law. This means we are responsible for deciding how we hold and use personal information about you.

The Romero Catholic Academy is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA137894.

You can contact The Romero Catholic Academy as the Data Controller in writing at:

Data protection Officer Romero Mac

C/O Cardinal Wiseman Catholic School

Potters Green Road

Coventry

CV2 2AJ

or admin@romeromac.com

2. What is a Privacy Notice?

A Privacy Notice explains how we collect, use, store and share your personal information, and your rights in relation to that information under UK data protection legislation.

3. What is Personal Information?

Personal information is any data that can identify you, either directly or indirectly.

Special category data includes more sensitive types of information such as:

- health information
- ethnic origin
- religious beliefs
- trade union membership

We may also process **criminal offence data** where permitted by law.

Where do we obtain your information?

We obtain personal information from:

- Information provided directly by you
- Governance application forms
- Skills audits and declarations of interest
- References and safeguarding checks
- Disclosure and Barring Service checks
- Companies House records

- Department for Education governance systems

This is an Article 14 transparency requirement where information may come from third parties.

4. What personal information do we process about you?

We collect and process the following information relating to Directors, Governors and volunteers:

Personal data

- Name, address, contact details
- Date of birth and nationality
- Occupation and professional background

Governance data

- Business and pecuniary interests
- Skills audits and governance profiles
- Meeting attendance and governance records

Recruitment and safeguarding data

- References
- Qualifications
- DBS information

Additional data

- Photographs (where applicable)
- Information provided for publication (e.g. website profiles)

Special category data

- Health information (where required for support or access)
- Disability or access requirements

The Romero Catholic Academy does not use automated decision-making or profiling when processing information relating to Directors, Governors or Volunteers.

5. Why do we use your personal information?

We use this data to:

- Ensure effective governance and oversight of the Trust
- Meet statutory requirements and legal obligations
- Carry out safe recruitment and safeguarding processes

- Enable communication and participation in governance activities
- Provide appropriate support and access arrangements
- Monitor equality and diversity
- Maintain transparency (e.g. published interests and profiles)

Certain roles require safeguarding checks including enhanced DBS checks, barred list checks, section 128 checks, identity verification and other checks required by Keeping Children Safe in Education (KCSIE).

6. What are our legal bases for processing your data?

We only process personal data when permitted by law.

Lawful bases under UK GDPR (Article 6)

We rely on:

- **Legal obligation** – to comply with education and company law
- **Public task** – to carry out governance functions of the Trust
- **Consent** – for certain activities (e.g. website profiles, photographs)
- **Vital interests** – in emergency situations

Special category data (Article 9 + DPA 2018 Schedule 1)

Where we process special category data, we rely on:

- Substantial public interest (e.g. governance transparency)
- Safeguarding of children and vulnerable individuals
- Legal claims
- Occupational health

Purpose	Data	Lawful basis	Special category condition
Governance records	Name, contact details	Public task	N/A
Disclosure of interests	Governance data	Legal obligation	N/A
DBS checks	Criminal data	Legal obligation	Safeguarding
Website profiles	Photos, biography	Consent	N/A
Accessibility support	Health data	Public task	Substantial public interest

Governance records will be retained in accordance with the Information and Records Management Society (IRMS) Schools Toolkit and statutory governance requirements. Retention periods vary according to the nature of the record and legal obligations applicable to academy trusts.

7. Who do we share your information with?

We only share your information where it is lawful and necessary.

Key recipients include:

- Department for Education (DfE)
- Local authorities
- Education and Skills Funding Agency (ESFA)
- Ofsted
- Companies House (Directors only)
- Disclosure and Barring Service (DBS)
- Auditors and professional advisers
- Diocesan education authorities
- IT and service providers (e.g. governance platforms, email systems)

Important information:

- Some organisations act as **data processors** (acting on our behalf)
- Others are **independent data controllers**

We ensure appropriate agreements and safeguards are in place.

8. International data transfers

Some of our systems and service providers may store data outside the UK.

Where this occurs, we ensure appropriate safeguards are in place, such as:

- UK adequacy regulations
- International Data Transfer Agreement (IDTA)
- Standard contractual clauses

You can request further information from the DPO.

9. How long do we keep your information?

We only retain your data for as long as necessary.

We follow the **Information and Records Management Society (IRMS) Schools Toolkit**, including:

- Governance records: typically retained in line with statutory requirements
- DBS and safeguarding records: retained in accordance with safeguarding law
- Basic contact details: retained for duration of role and a limited period after

Further details are available in our Records Management Policy.

10. Your rights

Under UK data protection law, you have the right to:

- Access your personal information
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing (where applicable)
- Data portability (where applicable)
- Withdraw consent at any time (where we rely on it)

To exercise your rights, please contact the Data Protection Officer..

11. Complaints

All complaints must follow our complaints procedure, if you have any questions regarding complaints please email admin@romeromac.com

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data protection rights have been breached.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113
Website: <https://ico.org.uk>

12. Data security

We have appropriate technical and organisational measures in place to protect your personal data, including:

- secure IT systems and restricted access
- data protection training for staff
- policies and procedures to manage information securely

13. Links with other policies

This Privacy Notice should be read alongside:

- Data Protection Policy

- Information Security Policy
- Records Management Policy
- Safeguarding Policy

14. Monitoring and Review

Responsibility for implementing and monitoring this Privacy Notice rests with The Romero Catholic Academy Trust as Data Controller, supported by the Data Protection Officer.

The Board of Directors delegate the implementation of this privacy notice to the Governing Body. This Privacy Notice is reviewed annually by CC2 Strategy, People and Organisational Development.