Privacy Notice
for
Members, Trustees & Governors

Empower Multi-Academy Trust | April 2026

1. About This Notice

Under UK data protection law (UK GDPR and the Data Protection Act 2018), individuals have a right to be informed about how Empower Multi-Academy Trust ('the Trust') uses personal data held about them. We fulfil this right by providing privacy notices wherever we process personal data.

This notice explains how we collect, store, use, and share personal data about Members, Trustees, and Governors ('governors') of the Trust and its academies.

2. Data Controller Identity & Contact Details

The Trust is the data controller for the purposes of UK data protection law:

Data Controller	Empower Multi-Academy Trust
Registered Address	Unit 6, The Courtyard, Yemonary Way, Battlefield Enterprise Park, Shrewsbury, SY1 3EH
Data Protection Officer (DPO)	Contact the Trust Governance Professional in the first instance, who will refer your query to the DPO as appropriate.
Trust Governance Professional	Contact via the Trust's central office. Details are available on the Trust's website.

3. The Personal Data We Hold

Personal data that we may collect, use, store, and share (when appropriate) about Members, Trustees, and Governors includes, but is not restricted to:

- Current and previous contact details – title, name(s), address(es), email address, and telephone contact details.
- Current governance positions: type of role appointed to, any positions held on an academy board, and term of office.

- Previous governance positions: type of role, positions held on an academy board, terms of office served, and reasons for resignations or suspensions.
- Training records: attendance at organised or commissioned training events.
- Attendance at meetings.
- Signed Code of Conduct, Declaration of Eligibility, and Register of Pecuniary Interest forms.
- Information provided as part of an application or appointment procedure, including any references taken.

4. Special Category Data

Certain categories of personal data are afforded enhanced protection under UK GDPR (Article 9). Where the Trust processes any of the following special categories, we will take additional steps to ensure it is handled appropriately:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Genetic information
- Biometric information
- Health information
- Information about sex life or sexual orientation

Where special category data is processed, we rely on Article 9(2)(g) UK GDPR (substantial public interest) read with Schedule 1, Part 2 of the Data Protection Act 2018 (statutory and government purposes), in addition to our Article 6 lawful basis described in Section 5 below.

5. Why We Use This Data

We use governors' personal data to:

- Comply with legal obligations, including those set out in the Academies Trust Handbook, funding agreements, and the Articles of Association.
- Submit governance data to the Department for Education (DfE) via the Get Information About Schools (GIAS) database — see Section 6 for full details.
- Publish required governance information (name, term of office dates, attendance at meetings) on the Trust and/or academy website, as required by the Academies Trust Handbook.
- Provide appropriate statutory advice and guidance.
- Deliver governor advice, guidance, information, and training.
- Facilitate the appointment, induction, and ongoing administration of governors.

6. Our Lawful Basis for Processing

We process governors' personal data under the following lawful bases under UK GDPR:

Lawful Basis	When We Rely on It
Article 6(1)(c) – Legal obligation	Where processing is necessary to comply with a legal obligation to which the Trust is subject, including obligations under the Academies Trust Handbook, funding agreement, Companies Act 2006, Education Act 2011, and statutory governance requirements.
Article 6(1)(e) – Public task	Where processing is necessary for the performance of a task carried out in the public interest, including the governance and oversight of state-funded education.
Article 6(1)(a) – Consent	In limited circumstances only, where we have a clear legitimate purpose and have sought your explicit consent (e.g., for optional diversity data or photographs). You may withdraw consent at any time without detriment.

Where we process special category data (see Section 4), we additionally rely on Article 9(2)(g) UK GDPR (substantial public interest) together with Schedule 1, Part 2, paragraph 6 of the Data Protection Act 2018.

7. Get Information About Schools (GIAS) & Statutory Submission to the DfE

The Department for Education (DfE) operates the Get Information About Schools (GIAS) register, a publicly accessible national database of schools and governance information in England.

The Trust has a statutory duty to submit governance data to GIAS. This duty arises under:

- The Academies Trust Handbook (ATH), which requires academy trusts to ensure governance information is current and accurately maintained on GIAS.
- The funding agreement between the Trust and the Secretary of State for Education.
- DfE guidance on governance transparency and accountability.

The data submitted to GIAS includes:

- Name of Members, Trustees, and local governors.
- Role or type of appointment.
- Date of appointment and term of office.
- Date of any resignation or removal.
- Details of business or pecuniary interests (Register of Interests).

Once submitted to GIAS, certain data is made publicly available in the interest of governance transparency and public accountability. The Trust cannot restrict the DfE's use of data once it has been lawfully submitted under this statutory obligation.

8. How Government Uses Your Data

This section explains how the Department for Education and other government bodies may use the governance data we submit on your behalf.

The DfE uses governance data held on GIAS for the following purposes:

- Identity verification: To confirm the identity and eligibility of individuals serving in governance roles across the school system.
- Public accountability and transparency: To enable parents, local communities, Ofsted, Regional Directors, and other stakeholders to understand who governs their local schools and trusts.
- Cross-governance visibility: To identify individuals who hold governance positions across multiple trusts or schools, supporting conflict-of-interest oversight.
- Regulatory and compliance functions: To assist Ofsted, Regional Directors (formerly Regional Schools Commissioners), and the DfE in assessing the suitability and effectiveness of governance arrangements.
- Policy and research: Anonymised or aggregated governance data may be used by the DfE to inform education policy and research.

The DfE is an independent data controller for the data it holds on GIAS. For further information on how the DfE uses your data, please refer to the DfE's own privacy notice, available at: https://www.gov.uk/guidance/data-protection-in-schools

9. Collecting This Information

Information about Members, Trustees, and Governors is provided by:

- The Trust or academy involved.
- The Company Secretary, Head of Governance, or Governance Professional.
- Individual Members, Trustees, or Governors themselves (including prospective appointees).

10. How We Store This Data & Retention Periods

We store personal data securely on IT systems and in manual records. Access is restricted to authorised staff who require it to perform their role.

We retain personal data for as long as is necessary to fulfil the purposes for which it was collected, or as required by law. The table below summarises our key retention periods:

Data Category	Retention Period	Reason
Contact details and governance position information (current governors)	Duration of appointment	Ongoing operational need

Contact details and governance position information (former governors)	6 years after end of term of office	In line with Limitations Act 1980; DfE and ATH requirements
Application forms and references	1 year after appointment decision (unsuccessful); 6 years after end of service (successful)	Legal claims limitation period
Meeting attendance records	6 years after the relevant meeting	Statutory governance records
Signed Code of Conduct, Declaration of Eligibility, Register of Interests	6 years after end of term of office	Legal obligation / accountability
Training records	6 years after end of term of office	Governance accountability

Our full records management and retention schedule is available from the Trust Governance Professional on request. We may retain data beyond these periods if required to do so by a legal obligation or regulatory requirement.

11. Data Sharing

We do not share information about Members, Trustees, or Governors outside the Trust without consent unless the law or another valid obligation requires us to do so. Where data is shared, we ensure that sharing is lawful, proportionate, and documented.

The table below sets out who we may share data with, why, and the lawful basis for doing so:

Recipient	Purpose of Sharing	Lawful Basis
Other academies within the Trust	Co-ordination of governance, conflict-of-interest checks, and operational administration.	Article 6(1)(c) legal obligation / Article 6(1)(e) public task
Department for Education (DfE) via GIAS	Statutory submission of governance data as required by the Academies Trust Handbook and funding agreement. See Section 7 for full details.	Article 6(1)(c) legal obligation
Ofsted	Regulatory inspection of governance arrangements at	Article 6(1)(c) legal obligation / Article 6(1)(e) public task

	the Trust or an individual academy.	
Regional Director (DfE)	Oversight of governance standards and compliance with the Academies Trust Handbook.	Article 6(1)(c) legal obligation / Article 6(1)(e) public task
Companies House	Disclosure of Trustee information as required under the Companies Act 2006 (where the Trust is constituted as a charitable company).	Article 6(1)(c) legal obligation
Charity Commission	Disclosure required under charity law applicable to the Trust.	Article 6(1)(c) legal obligation

12. Your Rights Under Data Protection Law

Under UK data protection law, you have the following rights in relation to your personal data:

Right	What This Means
Right of access	You can ask for a copy of the personal data we hold about you (a Subject Access Request).
Right to rectification	You can ask us to correct inaccurate or incomplete data.
Right to erasure	In certain circumstances, you can ask us to delete your personal data.
Right to restriction	You can ask us to restrict how we use your data in certain circumstances.
Right to data portability	Where applicable, you can ask us to provide your data in a portable, machine-readable format.
Right to object	You can object to processing based on legitimate interests or public task. We will stop unless we can demonstrate compelling legitimate grounds.
Right to withdraw consent	Where we rely on consent as the lawful basis, you may withdraw it at any time. Withdrawal will not affect the lawfulness of processing before withdrawal.
Right to complain	You have the right to complain to the Information Commissioner's Office (ICO) — see Section 14.

To exercise any of these rights, please contact the Trust Governance Professional in the first instance, or refer to our GDPR & Data Protection Policy.

13. Decisions You Can Make About Your Information

You are able to make various decisions about how we use your information:

- If information is incorrect, you can ask us to correct it.
- You can ask us to update information we hold about you.
- You can ask us to stop using your information, and if we are legally able to do so, we will comply.
- You can request that certain information is kept confidential (where this is compatible with our legal obligations).
- You can ask what information we hold about you and receive a copy. We will also tell you why we use it, where it came from, and who we have shared it with.
- You can ask us to delete the information we hold about you in certain circumstances.

To exercise any of these rights, please contact the Trust Governance Professional in the first instance.

14. 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 by contacting the Trust Governance Professional.

If your concern is not adequately resolved, you have the right to make a complaint to the Information Commissioner's Office (ICO):

- Online: https://ico.org.uk/concerns/
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF