



Trustee and Senior Management Privacy Notice

Version No:	1.2	Prepared by:	Bursar	Last review:	NA
Effective date:	20/05/25	Approved by:	ADPO	Next review:	05/27

Purpose of this Notice

This privacy notice explains how St Antony's College ("the College", "we", "us") processes personal data about individuals who act as trustees and senior managers of the College. It is issued in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Who We Are

St Antony's College is a registered charity (number 1141293) and a constituent college of the University of Oxford. The College is the data controller for the personal data we collect and use about our trustees and senior managers.

If you have any questions about this notice or how your data is handled, you may contact:

Data Protection Officer

Email: dpo@sant.ox.ac.uk

Address: St Antony's College, 62 Woodstock Road, Oxford, OX2 6JF

Categories of Personal Data We Collect

We may collect and process the following personal data about you:

- Your name, contact details, and biographical information
- Dates of appointment, tenure, and role(s) held within the College
- Declarations in relation to:
 - Criminal convictions or charges
 - Bankruptcy or insolvency
 - Director disqualification or liquidation history
 - County Court Judgments (CCJs)
 - HMRC recovery or enforcement actions
 - Prohibition notices under health and safety law
- A self-declaration confirming your status as a *fit and proper person* under HMRC and Charity Commission guidance
- Records of your trustee duties (e.g. meeting attendance, decisions, or related correspondence)

We do not collect or request special category data (e.g. health, ethnicity, political views) in the normal course of trusteeship.



Trustee and Senior Management Privacy Notice

Purposes for Processing

We process your personal data for the following purposes:

- To establish and maintain your position as a College trustee or senior manager
- To comply with our obligations under charity and tax law (e.g. confirming fit and proper status)
- To obtain and maintain appropriate insurance, including Directors' and Officers' liability cover
- To manage trustee appointments, term limits, and committee assignments
- To fulfil reporting obligations to external regulators (e.g. Charity Commission, HMRC)
- To ensure good governance and safeguard the College's legal and financial standing

Lawful Basis for Processing

The College relies on the following lawful bases:

- **Article 6(1)(f) – Legitimate interests:** The College has a legitimate interest in maintaining governance and managing risk through appropriate insurance and regulatory compliance.
- **Article 6(1)(c) – Legal obligation:** For data shared with HMRC or the Charity Commission in accordance with our duties under charity or tax law.
- **Article 10 & DPA 2018, Schedule 1, Paragraph 12 – Insurance purposes:** For processing any criminal offence data to enable the College to obtain and maintain trustee and senior manager liability insurance.

Sharing Your Information

We may share your information, on a need-to-know basis, with the following third parties:

- Our insurance broker and insurer (currently Aon), where required to obtain or renew cover. This will only occur **in the event of a positive declaration**. Aon operates as an independent Data Controller and provide their own [Privacy Notice](#).
- The Charity Commission, where required for registration or reporting purposes.
- HMRC, where applicable (e.g. for Gift Aid or audit purposes).
- Professional advisers (e.g. auditors, lawyers) acting on our behalf in compliance with our legal duties.

We will not share your data with third parties for marketing purposes.

Data Retention

We retain your personal data:

- For the duration of your role; and
- For up to **six years after the end of your appointment**, to comply with legal obligations and audit requirements.



Trustee and Senior Management Privacy Notice

Any declaration content relating to insurance (e.g. criminal or financial disclosures) will be retained only for as long as needed to secure insurance coverage, after which it will be securely deleted, unless a legal or regulatory reason justifies longer retention.

Your Data Protection Rights

As a data subject, you have the following rights under UK data protection law:

- To request access to your personal data
- To request correction of inaccurate data
- To object to or restrict processing in certain circumstances
- To request erasure of your data where there is no legal basis for retention
- To lodge a complaint with the Information Commissioner's Office (ICO)

You can exercise these rights by contacting the College's Data Protection Officer at:
dpo@sant.ox.ac.uk

Updates to This Notice

We may update this privacy notice from time to time. The latest version will always be available on the College website or from the Bursar's office.