Privacy Notice for Volunteers in Schools

1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **individuals working with Breadsall Hill Top Primary School in a voluntary capacity, not including Governors (please see separate Privacy notice).**

Transform Trust is the overall data controller across the Trust, but Breadsall Hill Top Primary School is the data controller for volunteers working in our school for the purposes of UK data protection law. Our data protection officer is shown below.

2. The personal data we hold

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

- Contact details
- Date of Birth
- Identification
- Application form
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of.
- Information about disability and access requirements.
- Photographs and CCTV images captured in school.
- Biometric data such as fingerprints or facial recognition to access school devices where consent is given (only in schools who use this facility).
- Complaints where relevant.
- Accident/Incident information e.g. where First Aid has been administered.
- Confidential information where relevant regarding Allegations against staff and low-level concerns.

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about 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.

3. Why we use this data

We use the data listed above to:

a) Facilitate safer recruitment, as part of our safeguarding obligations towards children and adults. b) Undertake equalities monitoring.

c) Ensure that appropriate access arrangements can be provided for volunteers who require them.

d) Biometric data to access school devices (only for schools who use this facility).

3.1 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 clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any volunteers' 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.

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

Under UK General Data Protection Regulation (UK GDPR) the lawful bases we rely on for processing your information is under Article 6:

(a) Consent: the individual has given valid consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

In additional, concerning any special category (Article 9) data:
(a) Explicit Consent.
(f) Legal Claims or judicial acts.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law.
- 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 the establishment, exercise or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

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.

5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from: • Local authorities

- Government departments or agencies
- Police forces, courts or tribunals

6. How we store this data

We keep personal information about you while you volunteer at our school. We may also keep it beyond your work at our school if this is necessary. Our Information Register sets out how long we keep information about volunteers.

GDPR states that schools should not store personal data indefinitely and that unless there is a legitimate reason to keep it e.g a legal requirement, it should only be stored for as long as it is necessary to complete the task for which it was originally intended. Once it is no longer needed it will be securely erased.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our local authority, (Insert name of Local Authority) – to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- Government departments or agencies.
- Our regulator, Ofsted.
- Suppliers and service providers such as:
- Catering
- Our auditors
- Health authorities
- Security organisations

- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts and tribunals

7.1 Transferring data internationally

If and where we need to 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.

8. Your rights

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact the Trust Data Protection Officer. You also have the following rights :

- The right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- The right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- The right to have your personal data rectified, if it is inaccurate or incomplete- this is called 'right to rectification'.
- The right to request the deletion or removal of personal data where there is no compelling reason for its continued processing- this is called 'right to erasure'.
- The right to restrict our processing of your personal data (i.e permitting its storage but no further processing)-this is called 'right to restriction of processing'.
- The 'right to object to processing' of your information, in certain circumstances.
- The right to obtain to direct marketing (including profiling) and processing for the purpose of scientific/historical research and statistics.
- The right not to be subject to decisions based purely on automated processing where it produces a legal or similarly effect on you.
- Rights in relation to automated decision making and profiling.
- The right to withdraw consent at any time (where relevant).
- The right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- Right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/.

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting: Jill Wilkinson.

10. Contact Us

If you would like to discuss anything in this privacy notice, in the first instance please contact the school office or you can contact the Trust's Data Protection Officer: dataprotection@transformtrust.co.uk.

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated September 2024.