

PRIVACY NOTICE FOR GOVERNORS AND VOLUNTEERS

This privacy notice informs you about how we use information about you and what we do with it. We call the information about you 'personal data' or 'personal information.'

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 our trust in a voluntary capacity, including governors/trustees.

Our trust, Future Academies [Lupus Street, London, SW1V 3AT, Tel: 020 7802 1910], is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Judicium (see 'Contact us' 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:

- Personal identifiers and contact details (name, date of birth, identification documents, contact details and address)
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- Trips and activities

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:

- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background

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) Establish and maintain effective governance
- b) Meet statutory obligations for publishing and sharing governors'/trustees' details
- c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- d) Undertake equalities monitoring
- e) Ensure that appropriate access arrangements can be provided for volunteers who require them
- f) To provide you with access to Trust and school facilities, including catering, security passes
- g) To communicate with stakeholders, such as parents, staff and students, eg the use of photos and/or names

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 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 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 child's personal data for the purposes listed in section 3 above are as follows:

Our lawful bases for processing your personal information for the reasons listed in section 3 above are:

- a) For the purposes of item a in section 3, in accordance with the 'public task' basis - the processing is necessary for the Academy to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law. We need to process data to fulfil our official duties as a school under the Academies Act
- b) For the purposes of items b,c,d and e in section 3, in accordance with the 'legal obligation' basis – the processing is necessary for the Academy to comply with the law (not including contractual obligations). We need to process data to meet our responsibilities under law as set out here:
Education Act 2002
Equality Act 2010
Companies Act 2006
- c) For the purposes of item f in section 3, in accordance with the 'consent' basis – the individual has given clear consent for the Academy to process their personal data for a specific purpose. We will obtain consent from you to use your personal data
- d) For the purposes of item g in section 3, in accordance with the 'contract' basis – the processing is necessary for a contract the Academy has with the individual, or because they have asked you to take specific steps before entering into a contract. we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- e) Where you've provided us with consent to use your information, you may take back this consent at any time. The consent basis is where the individual has given clear consent for you to process their personal data for a specific purpose. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

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 one 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, 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 Data Retention Policy sets out how long we keep information about governors/Trustees and other volunteers.

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, to meet our legal obligations to share certain information with it, such as safeguarding concerns

- Government departments or agencies
- Our regulators, including the Department for Education and Ofsted
- Suppliers and service providers:
 - Catering provider, if you wish to be registered on that system
 - HR providers, eg for the purposes of disclosure and barring service checks
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

8. YOUR RIGHTS

8.1 How to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

1. Give you a description of it
2. Tell you why we are holding and processing it, and how long we will keep it for
3. Explain where we got it from, if not from you
4. Tell you who it has been, or will be, shared with
5. Let you know whether any automated decision-making is being applied to the data, and any consequences of this
6. Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- A. Object to our use of your personal data
- B. Prevent your data being used to send direct marketing
- C. Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- D. In certain circumstances, have inaccurate personal data corrected
- E. In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- F. Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- G. In certain circumstances, be notified of a data breach
- H. Make a complaint to the Information Commissioner's Office
- I. Claim compensation for damages caused by a breach of the data protection regulations

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

9. 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.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- a) Report a concern online at <https://ico.org.uk/make-a-complaint/>
- b) Call 0303 123 1113
- c) Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. CONTACT US

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**. Our data protection officer is:

Judicium Consulting Ltd
72 Cannon Street London EC4N 6AE
Email: dataservices@judicium.com
Telephone: 020 3326 9174

However, our **data protection lead at Future Academies** has day-to-day responsibility for data protection issues in our Academy. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them at:

By email: governance@futureacademies.org

By phone: 020 7802 1910

By post: Future Academies, Pimlico Primary, Lupus Street, London, SW1V 3AT