



Privacy Notice

Governors Trustees & Volunteers

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Introduction

Under data protection law, individuals have a right to be informed about how the Vantage Academy Trust (herein referred to as the trust) processes the personal data that we hold about them. We comply with this right by providing Privacy Notices to the individuals whose personal data we process.

This Privacy Notice outlines what personal data we process about individuals working with the trust in a voluntary capacity, namely governors, trustees and volunteers.

The trust is the **Data Controller** for the personal information that we process, this means that we are responsible for the information and make decisions on how it is used.

Data Protection Officer

The trust has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the relevant data protection legislation. Our DPO provides support to the trust and its schools and acts as the first point of contact for any questions or queries regarding data protection.

Our DPO is Miss Danielle Eadie from RADCaT Ltd who can be contacted via our respective school offices or directly using the following details:

T: 01942 590 785 | **E:** Danielle.eadie@radcat.co.uk

What personal data do we process?

Dependent upon the nature of your role, the trust will process the some or all of the following personal data to meet our legal obligations and effectively manage your time in post:

- Name & contact details
- Role
- Dates of appointment
- Meeting attendances & contributions
- Records relating to business and pecuniary interests.
- DBS information
- Disabilities and / or medical conditions that may affect your role.
- Characteristics including gender, ethnicity and religion.
- Images (promotional)

- Images (CCTV)

Where we get your data from?

Most of the personal information that we process is provided directly by you when you join the trust as a volunteer and complete our induction process. As part of this process, we will also receive information from the following parties:

- The government and / or Local Authority if you express your interest to become a governor at the trust or one of our schools.
- Our DBS provider following submission of your data to them to perform a check.

Further personal data will be collated by us as your role with the trust progresses for instance when recording your attendance at meetings, corresponding with you and updating your file with any notes and training logs.

At the point of collecting your data, we will always inform you whether the data processing is mandatory or whether you have a choice.

Why we need this data?

The trust process your personal data to support the following purposes:

- Facilitate our operational duties; correspond with you and provide you with access to the necessary resources to fulfil your role.
- Establish and maintain effective governance.
- Meet the legal and statutory obligations placed upon us.
- Facilitate safe recruitment and meet our safeguarding obligations.
- Undertake equal opportunities monitoring.
- Give the school community and insight into school life.
- Ensure a safe and secure environment for all members of the trust.

Lawful basis for processing

The trust must have a lawful basis from the UK-GDPR to process your personal data, we currently rely upon the following:

- We process your personal data to meet a legal obligation, namely the duties placed upon us by the Government and Local Authorities.
- We have a contractual obligation; we are processing your personal data as it is required to fulfil an agreement or contract that we have that involves you.
- We are processing your personal data to perform a task in the interest of the public including performing a DBS check to meet our safeguarding obligations.

- You have provided your consent to process your personal data in a certain way; providing permission to add your picture to your volunteer profile on our website for instance or joining our mail list to receive details of promotional events and activities.

Information about you that is much more sensitive in nature is referred to as **'Special Category Data'** under the UK-GDPR. Examples include information about your health & wellbeing, gender, ethnicity and religion. When processing this type of data, we rely upon the following:

- The processing of your data is necessary to meet our obligations in the field of employment, social security and protection; when processing your health information to ensure reasonable adjustments are in place to support your role where required.
- The processing is necessary for reasons of substantial public interest, in particular when processing data relating to your health, gender, ethnicity and religion to meet our obligations under the Equalities Act (2010).

Less commonly, we may be required to process your personal data in the act of protecting or saving your life or that of another person in emergency situations. Our lawful basis for processing your personal data in such scenarios is to protect the vital interests of yourself or another third party.

Where consent is the lawful basis for processing (it is optional), you can withdraw your consent or change your preferences at any time by contacting the trust or your respective school office.

Who we share your personal information with?

The trust do not share your personal data with any third parties unless the law or our policies allow us to do so. We have a legal obligation to share the personal data of governors and trustees with:

- Government: The Department for Education (DfE) require us to submit basic data about you which is publicised on their 'get information about schools' website'. You can find out more about these statutory data collections here: <https://get-information-schools.service.gov.uk/privacy>
- Local Authority: A basic record of each governor and trustee is kept by the Local Authority (LA). Your data may also be shared with the LA if you have been referenced in any records that we must share with the LA to meet a legal obligation. For example, as part of your role you have supported the trust and attended meetings regarding a permanent pupil exclusion and that pupil's exclusion records are shared with the LA.

As part of our routine operations, we will share your data with the following third parties where necessary:

- Service Providers: In instances where we share your data with third party providers of key services to the school to support our operations such as ICT who will manage your email and system access.
- Professional Advisers: In circumstances where the trust seeks legal advice, and we must share records with those professional advisors that contain your personal data.

- References: We will provide a reference about you to recruitment agencies and future employers upon request to support your career development.
- Auditors: The trust is subject to external auditors who may access your records as part of the auditing process to ensure we are meeting high standards of compliance and best practice. Auditors will always remain in the presence of a senior member of staff and records will not be taken off site.

If an incident or accident occurs that you are party too, the school may share your information with the following parties where necessary:

- Police
- Emergency Services
- Courts
- Insurers
- Governing Bodies (HSE, ICO etc)

The trust apply a minimalist approach to data sharing and will only transfer a limited amount of data and only if it is strictly necessary. Any transfers of personal data is done so securely with password protection in place. We perform compliance checks on third party service providers to ensure they meet the same high levels of security and data privacy as expected by the trust.

We do not routinely share the personal data outside of the United Kingdom. If a situation arises in which we must do so, we will ensure that your data is shared in compliance with data protection legislation.

Publishing Data on our Website

The trust and its schools are required by law to publicise basic information about our governors and trustees on its websites to support transparency. This is limited to your name, position, dates in post and attendance at panel meetings; we will also include an image and a little about you to your profile with your permission.

You can keep up to date with the items the trust must publish here:

<https://www.gov.uk/guidance/what-academies-free-schools-and-colleges-should-publish-online>

Marketing

If you have provided us with consent to do so, the trust and / or it's schools may send you marketing information by email or text to promote events, campaigns, charitable causes and services which may be of interest to you. Please note that such communications are completely optional, and you can opt out at any time by clicking the 'unsubscribe' links in the body of the message or by contacting the trust directly.

How we store your personal data?

Most of the personal data that we hold about you is stored securely in electronic format on the school system and only accessed by our staff if it is strictly necessary to perform their roles. Trust staff are subject to confidentiality agreements and regular training on data protection.

Electronic records are subject to strict access controls and password protection whilst any paper records will be kept in locked cabinets with key access limited. As a rule of thumb, paper records such as meeting notes will be scanned and uploaded to a secure system and the physical copies shredded.

How long we keep your personal data?

The trust only retain personal data for as long as necessary to fulfil the purposes for which it was collated. As a rule of thumb, governor, trustee and volunteer records will be kept for a period of six years once your post with us has ceased. If you are referenced in the principle set of governor and trustee meeting notes, these records must be retained indefinitely.

Please contact us to request a copy of our 'Records Management & Retention Policy' that provides further information on how long the trust retain data.

What are your rights?

Under the UK-GDPR, you have a right to access the personal data that we hold about you by making a subject access request (SAR). If you make a SAR and we do process the data you have requested access to, we will:

- Give you a description of it
- Explain why we are processing it and how long we will hold it
- Explain where we collected the data if not from you
- Outline if the data has been or will be shared with any other parties
- Inform you if any automated decision making has been applied to the data and provide any consequences of this
- Provide you with a copy of the data in an intelligible form.

Along with the right to access your personal data, you also have the following rights under the UK-GDPR:

- The right to ask us to rectify any personal information you feel is inaccurate or incomplete
- The right to ask us to erase your personal data in certain circumstances
- The right to ask us to restrict the processing of your personal data in circumstances
- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to transfer the personal data you provided to another organisation in certain circumstances.

If you would like to exercise any of your rights, please contact the trust's Data Protection Officer (DPO) in the first instance.

A response will be provided to you within one calendar month. The trust reserves the right to extend the response time by a further two calendar months if your request is complex, we will however inform you of any intention to extend within the first month.

Complaints

If you have any concerns at all about how we process your personal data, please contact us in the first instance so that we can help resolve any issues.

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk>