



Privacy Notice for Volunteers

(including Directors, Governors and school volunteers)

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was updated on **26th January 2023**.

You will find the latest version of the Privacy Notice for Volunteers at www.pdet.org.uk

Privacy Notice for volunteer roles

This document is about how we collect, store and use personal information (or personal data) about volunteers – this includes Directors, Governors and school volunteers.

Who we are

Peterborough Diocese Education Trust (PDET) (the Trust), of which you are a volunteer, or are to become a volunteer, is in charge of your personal information. This means the Trust is called the Data Controller.

The postal address of the Trust is Unit 2 Bouverie Court, 6 The Lakes, Bedford Road, Northampton, NN4 7YD.

If you want to contact us about your personal information you can contact our Data Protection Officer (DPO) who is Angela Corbyn in the following ways:

- by telephone 07775 436141
- leave a letter at our offices at the address above or send one by post
- by email: dpo@pdet.org.uk

In this policy 'we' and 'us' means the Trust.

The categories of volunteer information that we process

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

- **identity and contact data** (such as name, title, gender, marital status and dependents, nationality, country of residence, date of birth, postal address, telephone numbers, email address, copy of driving licence, copy of passport);
- **biographical and social information** such as your opinion, interests and lifestyle, social circumstances, hobbies and interests, and any other personal information that you choose to provide;
- **images** such as photographs and video recordings held both in digital and manual format in relation to your role;
- **support contact details** such as contact details for your close relatives, next of kin, representatives and emergency contact information;
- **correspondence** between us such as emails, correspondence relating to incidents and complaints;
- **information about how you use our information and communications systems** including email and internet services;

- **technical information** such as information obtained through electronic means such as CCTV footage;
- **attendance information** (such as sessions attended, number of absences, absence reasons; this includes publishing attendance information) for those in a director or governor role;
- **employment/work records** including job titles, location of employment or workplace work history, skills;
- **evidence of qualifications**;
- information about **business and pecuniary interests** for those in a director or governor role;
- **references** / recommendations / input from others as to suitability for the role;
- **family interests** within the Trust;
- **term of office** for those in a director or governor role;
- **type of role and committee membership** for those in a director or governor role.

Special categories of personal data

Sometimes the information we collect is more sensitive such as information about health and medical needs or safeguarding information. We call this “special category personal data”. Special category personal data relates to information concerning health, genetics, biometrics (where used for identification purposes) racial or ethnic origin, political opinions, sexual orientation, sexual life and religious beliefs.

Some examples of special category personal data the Trust collects about volunteers are as follows:

- information about your racial or ethnic origin, religious or philosophical beliefs including Church involvement, and political opinions;
- information about your sexual orientation;
- health and medical conditions and disability (for example, where we need to make reasonable adjustments to your work environment because of a medical condition);
- safeguarding information such as information from the Disclosure and Barring Service (DBS) checks;

Criminal offence data

We may also collect and use information about criminal offences (such as information about criminal convictions or allegations) but only where the law permits, for example where we are required by law to carry out ‘pre-employment’ checks and Data Barring Service (DBS) checks.

Why we collect and use volunteer information

We collect and hold personal information relating to our volunteers and this may include collecting and receiving information about them from others including referees. We use this personal data to:

- facilitate safer recruitment, as part of our safeguarding obligations towards pupils;
- undertake equalities monitoring;
- ensure that appropriate access and other arrangements can be made for those who need them.

Also, specifically for those in a director or governor role, to:

- establish and maintain effective trust governance;
- make director and governor appointments and removals;
- consider your suitability for the role generally. In relation to information regarding religious beliefs and Church involvement, this is to consider suitability in relation to upholding, preserving and developing the Church School ethos;
- monitor director and governor skills and address gaps;
- meet statutory obligations for publishing and sharing director and governor details;
- comply with the statutory duties placed on us in respect of Company Law, Charity Law and Multi Academy Trust governance.

The Trust will only use your personal data when the law allows us to. In most cases, we anticipate that we will use your personal data for the following legal reasons:

1. **Legal obligation:** we will need to process your personal data in order to comply with our legal obligations, for safeguarding purposes and for the prevention and detection of crime. For example, we are required by law to carry out due diligence checks with the DBS.
2. **Public task:** The Trust needs to process your personal information because it has tasks to perform that are in the public interest or exercising official authority, both of which are laid down in law. For example:
 - as a public authority the Trust will need to process your personal data in order to comply with its statutory functions to run the Trust and to provide education;
 - the Trust needs information about its volunteers to run the Trust lawfully, safely and efficiently, safeguard its pupils, keep its property, workers and pupils safe and comply with all of its legal, educational and regulatory duties and obligations.
3. **Legitimate interests:** we will process your personal data where it is necessary for

our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example:

- where we need to use volunteer information for reasonable Trust purposes such as obtaining insurance or seeking professional advice from a third party professional;
 - to use images, video and audio recordings of volunteers in school / the Trust and on the individual school or Trust website or our social media channels for reasonable Trust purposes;
 - to monitor use of the Trust’s IT systems to make sure they are being used appropriately and in accordance with the law and Trust policies and procedures;
 - to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
4. **Consent:** in most cases, we will not need your consent to use your personal information. However, there are a few occasions where we either need it or choose to ask for it, for example, where we use your personal data for the purpose of direct marketing.
5. **Vital interests:** rarely, we may need to process personal data of our volunteers to protect you or someone else’s life. For example, to share information about medical conditions that you may have with a doctor or hospital in the event of an accident.

The Trust will also need to process your **special category personal data** and/or criminal offence information (such as information about criminal convictions or allegations) for the following legal reasons:

- **legal obligations in connection with safeguarding:** we will need to process special categories of your personal data where we need to carry out our legal obligations;
- **explicit consent:** rarely, we will process special categories of your personal data if you have given us your explicit consent but only where consent is appropriate;
- **vital interests:** rarely, we may need to process personal data of our volunteers to protect someone’s life. For example, to share information about medical conditions that you may have with a doctor or hospital in the event of an incident or accident;
- **reasons of substantial public interest (with a legal basis):** we will process your personal data when it is necessary for reasons of substantial public interest with a basis in law, for

example: to share information with the police or social services where this is necessary in order to safeguard a pupil's welfare; or for legal and regulatory purposes such as child protection; or investigating allegations of malpractice or unfitness to work with children; or diversity monitoring; or health and safety etc. The Trust has an Appropriate Policy Document in order to comply with the Data Protection Act 2018 which regulates this sort of processing;

- **legal claims:** we may need to process special categories of your personal data in connection with legal claims such as where a complaint or legal claim is brought against you or the Trust or in order to investigate allegations;
- **other reasons:** less commonly, we may need to process special categories of your personal data where you have **already made this information public** or for **health or social care purposes** (with a basis in law) or for **public health purposes** (with a basis in law), for example: where information needs to be collected and used in connection with a public vaccination programme; or in response to a pandemic such as COVID-19. Where this happens, the data is handled by a health professional such as a nurse or someone who the law says must keep your information confidential.

How we collect volunteers' information

We collect information from our volunteers directly. We also collect references / recommendations / input as to suitability for the role from others in particular the Headteacher, Incumbents/Parish (in relation to Church Governors), the Diocesan Board of Education and its officers (in relation to Church Governors), Chair of Governors, staff and parents (in relation to elections for staff governors and parent governors).

When we collect personal information on our forms, we will make it clear whether there is a legal requirement for you to provide it or whether there is a legal requirement on the Trust to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.

How we keep your information and how long for

We only keep your information for as long as we need to or for as long as the law requires us to. We have a policy which explains how long we keep information. It is called the Records Retention and Deletion Policy and you can find it on your school's / the Trust's website or you can ask for a copy at your school's office.

When we may share volunteer information with others

We will not give information about our volunteers to anyone without their consent unless the law and our policies allow us to do so.

We are required, by law to pass some information about our Directors and Governors to the Department for Education (DfE). This is the part of the Government which is responsible for schools/academies. This information may, in turn, then be made available for use by the local authority and external auditors.

The DfE may also share information about Directors and Governors that we give to them, with other people or organisations. This will only take place where the law, including the law about data protection, allows it. For further information about the Department's data sharing process, please visit <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

Contact details for the DfE can be found at <https://www.gov.uk/contact-dfe>

In relation to the role of Director, we are/may also be required to pass some information about you to Companies House and the Charity Commission and your information will be published in accordance with Company Law and Charity Law requirements. Further information about the privacy notice from the Charity Commission, can be found at <https://www.gov.uk/government/organisations/charity-commission/about/personal-information-charter#this-privacy-notice>

We disclose personal data about you to the Disclosure and Barring Service for the purposes of carrying out checks on your suitability for work with children through Access who administer the service and also provide software for maintaining our single central record (SCR).

Your information will/may also be shared with:

- the schools within our Trust and the Central Team;
- Directors, as part of fulfilling their obligations in relation to governing the Trust;
- suppliers and service providers to enable them to provide the service we have contracted them for, such as Director / Governor support, training and clerking;
- professional advisors and consultants;
- police forces, courts;
- the Headteacher, Incumbents/Parish (in relation to Church governors), the Diocesan Board of Education and its officers (in relation to Church governors), parents (in relation to parent governors), staff (in relation to staff governors), and the Chair of Governors of the

school where you are or have applied to be a governor.

Your information will be published in accordance with Company Law and Charity Law requirements.

Transferring your personal information to other countries

Occasionally we may need to transfer your personal data outside the UK, for example, some of our suppliers and service providers are located outside the UK and may see your personal information when providing us with software support, or a company which we use for carrying out surveys may handle your contact information on our behalf.

On the few occasions where we do transfer your information outside the UK, we will ensure it is protected and handled in line with data protection law. For example, we will only transfer it to a country that is officially considered to provide adequate protection for personal data or protect it by using one of the safeguarding measures available under data protection law.

If you would like more information about how we protect your personal information if it is transferred outside the UK, please contact our Data Protection Officer.

Your data protection legal rights

Data protection law provides you with the following legal rights in certain circumstances:

- you can ask us for a copy of the information we have about you;
- you can ask us to correct any information we have about you if you think it is wrong;
- you can ask us to erase information about you (although we may have good reasons why we cannot do this);
- you can ask us to limit what we are doing with your information;
- you can object to what we are doing with your information;
- you can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

If you want to use your rights, for example, by requesting a copy of the information which we hold about you, please contact the Data Protection Officer. There is more information in our Data Protection Policy. The policy can be found on our website - www.pdet.org.uk/key-documents/policies or your school's website.

Your right to complain

You can complain to our Data Protection Officer (see page 2 for contact details) about what we do

in relation to your personal information. If you are not happy with our answer to your complaint, then you can complain to the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.