

THE CHARTER SCHOOLS

EDUCATIONAL TRUST

Privacy notice for volunteers including members, trustees and governors

Author (s)	S Varcoe - DPO
Functional Area (Finance, HR, Trust Board etc.)	Governance
Scope (Trust, School, Other)	Trust-wide
Version	2
Effective Date	March 2023
Next Review Date	March 2026

The Charter Schools Educational Trust ("the Trust") uses personal data about Members of the Trust, Trustees, Local Governing Body members and others who volunteer in the Trust.

It is the Data Controller for personal information such parties provide to us. This means it decides the purposes which and the manner in which, any personal data relating to those taking voluntary positions within the Trust is to be processed. This Privacy Notice explains how we collect, store and use personal data about those who are involved in a voluntary capacity with the Trust

The Head of Governance and Compliance, Shalene Varcoe, is our Data Protection Officer. Their role is to oversee and monitor our data processing practices. If you have any queries regarding anything in this Privacy Notice, please contact them by email at svarcoe@tcset.org.uk or write to them at

Shalene Varcoe
Data Protection Officer
The Charter Schools Educational Trust
The Charter School North Dulwich
Red Post Hill
London
SE24 9JH

Why do we need your Information?

We process personal data in order to meet the safeguarding requirement set out in UK employment and childcare law including the following:

- Funding Agreements with the Department for Education ("DfE")
- Safeguarding Vulnerable Groups Act 2006
- The Guidance "Keeping Children Safe in Education"
- The Childcare (Disqualification) Regulations 2009

The personal data of those volunteering with the Trust is also processed to assist in the running of the Trust and its schools for the following reasons:

- For safeguarding checks and the right of volunteers to work in the UK
- To support professional development of volunteers
- To inform the development of recruitment and retention policies
- To enable the development of a comprehensive picture of those involved in a voluntary/governance capacity with the Trust
- To assess the quality of the members of Trust Governance and other volunteers
- To maintain effective Governance
- To comply with the law regarding data sharing
- To undertake equalities monitoring and to ensure that appropriate access arrangements are in place for volunteers

Accordingly, the Trust has a legal requirement and legal interest to collect and process personal data relating to those who volunteer with the Trust.

What categories of information are processed?

The categories of personal information that we process can include the following:

- Personal information (e.g. name, address, email address, phone number, national insurance number)
- Special categories of data (e.g. ethnicity or gender)
- Work history (e.g. previous employers, job roles)
- Reference information
- Education and qualifications
- Training records and professional memberships
- Proof of right to work (e.g. copies of documentation)
- Criminal record
- Results of pre-appointment screening checks (e.g. DBS checks, vetting and due diligence checks)
- Health information (e.g. details of medical conditions)
- Preferred method of contact
- Role preferences
- Information about business and pecuniary interests
- CCTV images
- Photographs
- Video recordings (e.g. high quality educational institutional videos and online content)

The Lawful Basis on which we process this Information

- Article 6 1(c) of the United Kingdom General Data Protection Regulation ("GDPR") which allows processing that is necessary to comply with a legal obligation;
- Article 6 1(e) of the GDPR which allows processing that is carried out in the public interest;
- Article 6 1(f) of the GDPR which allows processing that is necessary for the purposes of a legitimate interest;
- Article 9 2(b) of the GDPR which allows the processing of special category data that is necessary for carrying out obligations in the field of social protection law;
- Article 9 2(g) of the GDPR which allows the processing of special category data that is necessary for reasons of substantial public interest;
- Article 9 2(j) of the GDPR which allows the processing of special category data when it is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Collecting volunteers' information

Whilst the majority of information that you provide to us is mandatory, some of it is provided on a voluntary basis. In order to comply with data protection legislation, we will inform you when your consent is required. Volunteers' personal data may be obtained and processed from third parties where the law requires us to do so.

Storing Information

Personal data is stored securely in line with our Records Management and Data Protection Policies. In accordance with data protection legislation, it is only retained for as long as necessary to fulfil the purposes for which it was obtained, and not kept indefinitely.

Data Transferred outside the UK

Processors that we use may transfer and hold data outside of the UK. We will ensure that organisations that process personal data on our behalf only transfer data to countries that the UK Government deems as having adequate levels of protection in place and in accordance with UK Data Protection obligations. If a processor is found to be transferring data to a country that does not have adequate protections or to an organisation, then we will terminate our contract or other relationship with them.

Who we share data with

We do not share information about those who volunteer with the Trust with anyone without permission unless the law and our policies allow us to do so. Where necessary third parties may process personal information. Where this is required, the Trust places data protection requirements on third party processors to ensure data is processed in line with staff members' privacy rights. We share information with the following:

- Local Authorities
- DfE
- Registrar of Companies
- Education Skills Funding Agency
- Ofsted
- Independent Schools Inspectorate
- HMRC
- Benefits agencies (e.g. Dept. for Work & Pensions)
- Police and courts
- Social Services
- Management Information Systems (e.g. BROMCOM, Safeguarding and accident reporting systems)
- Text and Email communication systems
- Recruitment Service Providers

- Providers of visitor management and access control systems
- Providers of online learning resources
- Providers of financial management software
- Providers of suppliers and service providers to the Trust including professional advisers and consultants.
- Photography and design agencies
- Trust Auditors
- Those that requests references from us.

What are your Rights?

Volunteers have specific rights in relation to the processing of their personal data. You have a legal right to:

- Request access to the personal data that the Trust holds
- Request that your personal data is amended if it is inaccurate or incomplete
- Request that your personal data is erased where there is no legal basis for its continued processing
- Request that the processing of your personal data is restricted
- Object to your personal data being processed if it is likely to cause, or is causing, damage or distress.

Requests should be submitted to the Data Protection Officer (on the contact details provided above). The Trust will consider all requests in line with your legal rights and the Trust's legal obligations.

Where the processing of data is based on explicit consent, there is a right to withdraw consent at any time. This will not affect any personal data that has been processed prior to withdrawing consent.

If you have a concern about the way the Trust is collecting or using your personal data, please raise the concern with the Data Protection Officer in the first instance. You can also contact the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>

How the Government uses your data?

We are required to share information about those involved in Trust Governance with the DfE by obligation of the Academies Trust Handbook via Get Information About Schools ("GIAS") and to keep the information up to date.

The data we lawfully share with the DfE through GIAS:

- Increase the transparency of governance arrangements.
- Enable schools and the DfE to quickly and accurately identify individuals who are involved in governance and who govern in more than one context.

Last updated: 31 March 2023

- Allow the DfE to be able to uniquely identify an individual and, in a small number of cases, conduct checks to confirm their suitability for this important and influential role.

You can find out more about the requirements placed on the school by the DfE, including the data we share with them, via this website: <https://www.gov.uk/government/news/national-database-of-governors> .

Some of this personal data is not publicly available and is encrypted within the GIAS system. Access is restricted to authorised DfE and education establishment users with a DfE Sign-in account who need to see it to fulfil their official duties. The information is for internal purposes only and is not shared beyond the DfE, unless the law allows it to be.

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link: <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>.

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

We are also required to share information about Members and Trustees with the Registrar of Companies via Companies House. Further information about how Companies House uses the information of Members and Trustees can be found at:

<https://www.gov.uk/government/organisations/companies-house/about/personal-informationcharter>.

Auditors

Some of your details may be passed to auditors to enable them to carry out their work in overseeing governance reviews of the school. This data will be similar to that which is published by the DfE on GIAS.

Updating this privacy notice

We made need to update this privacy notice periodically if we change how we collect and process data. The Trust will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

This privacy notice was last updated on **31st March 2023**.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact **Shalene Varcoe, Data Protection Officer** on svarcoe@tcset.org.uk.

If you require further information about how we and/or the DfE store and use your personal data, please visit our website, www.tcset.org.uk, contact the DfE directly via their [website](#), or download our [Data Protection Policy](#).