



ALEC REED ACADEMY
PROUD TO LEARN

Privacy Notice for trustees and volunteers

Policy Owner:	Margo Muris	Approved By:	Trust Board / Principal & CEO
Target Audience:	Trustees and volunteers in the Academy	Requirement to Publish on Website:	Yes
Purpose:	To inform about personal information stored and its use and the rights of trustees and volunteers over this	Statutory Policy:	Yes
Review Date:	July 2023	Approval Date:	July 2022
Oversight by: Board Member/ Committee	HR Committee		

Purpose

This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

It applies to trustees and volunteers.

Who collects this Information?

Alec Reed Academy is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you understand how we are processing your information and the procedures we take to protect your personal data.

Data Protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy on our website.

The categories of Academy information that we process include:

- personal information and contact detail such as name, title, address, mobile number, date of birth, personal email:
- Emergency contact information such as names, relationship, phone numbers and email addresses
- Information collected during the recruitment process on your application form, including education, qualifications and employment details,
- Characteristics information (such as age, ethnic group)
- Information about business and pecuniary interests;
- Information in your sickness and absence records such as number of absences and reasons (including sensitive personal information regarding your physical and/or mental health);
- Criminal records information as required by law to enable you to work with children
- Details of your time and attendance records.
- Information about the use of our IT, communications and other systems, and other monitoring information.
- Details of your use of business-related social media.

- Images of staff captured by the Academy's CCTV system.
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within the Academy, you will be notified separately if this is to occur); and
- Details in references about you that we give to other potential employers.
- Recordings from the Academy's video conferencing platform
- Relevant medical information

This list is not exhaustive, to access the current list of categories of information we process please request this of Margo Muris.

How we collect this Information

Most of the information that we collect from you is mandatory and on your application form, however there is some information that you can choose whether or not to provide it to us. 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.

We may collect this information from you directly, or from a number of third-party sources, such as other employees, the DBS, technical networks and so on.

Why we collect and use workforce information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to perform a agreement, we have entered into with you.
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation).
- Where it is needed in the public interest or for official purposes.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.
- When you have provided us with consent to process your personal data.

The situations in which we will process your personal information are listed below: -

- To determine appointment and suitability as a trustee or volunteer worker.
- To deal with election of trustees.
- To comply with safeguarding obligations.
- To provide details on our website or online databases, including Companies House, about trustees & directors.
- To communicate with third parties and other stakeholders to the Academy.
- For business management and planning purposes (including accounting, budgetary and health and safety purposes).
- For financial purposes (such as expenses).
- To deal with any complaints/investigations as required.

- When you sit on a panel or committee, name and comments as well as decisions made.
- To send communications in your role as trustee.
- For education, training and development requirements.
- In order to review governance of the Academy.
- To comply with any legal dispute or any legal obligations.
- To comply with regulatory requirements or health and safety obligations.
- To ensure system security, including preventing unauthorised access to our networks.
- To monitor use of our systems to ensure compliance with our IT processes.
- To receive advice from external advisors and consultants.
- To liaise with regulatory bodies (such as the DfE, DBS); and
- Dealing with termination of your appointment.

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure health and safety). Where you have provided us with consent to use your data, you may withdraw this consent at any time.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How we use Sensitive Information

Sensitive personal information (as defined under the UK GDPR as “special category data”) require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations in line with our data protection policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent.

We will use this information in the following ways: -

- Collecting information relating to leave of absence, which may include sickness absence or family related leave.
- To comply with voluntary employment and other laws;
- Collecting information about your physical or mental health, or disability status, to ensure your health and welfare in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to manage sickness absence and to administer benefits.

Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations.

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us

Sharing data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following:

- Government departments or agencies
- The Local Authority
- Companies House
- Suppliers and Service providers
- Professional advisors and consultants
- The Department for Education and its online site – Get Information for Schools
- Law enforcement
- Support services
- DBS.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Retention periods

Except as otherwise permitted or required by applicable law or regulation, the Academy only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Once you are no longer a trustee or volunteer of the academy we will retain and securely destroy your personal information in accordance with our data retention policy. This can be found on our website. For more information on our data retention policy and how we keep your data safe, please request this of the Clerk.

Security

All information is held securely either in electronic format under software and hardware controls including access limited to relevant staff and password controls; or if held in hard format, data is held securely in locked room and cupboards. You can find further details of

our security procedures within our Data Breach policy and our Information Security policy, which can be found on ARA Teams.

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact Margo Muris, Director of Finance and Resources in writing.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Margo Muris. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

How to Raise a Concern

We hope that Margo Muris can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Margo Muris, then you can contact the DPO on the details below: -

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.