



# Nene Education Trust

## **Privacy notice for Volunteers which includes: Member/Trustee/Governors and other volunteers of The Nene Education Trust**

Under data protection law, individuals have a right to be informed about how The Nene Education Trust uses any personal data we hold about them. We comply with this right by providing 'privacy 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 the Nene Education Trust in a voluntary capacity, including Member/Trustee/Governors. Throughout this policy will be referred to as 'volunteers'.

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

Nene Education Trust the Trust of which you are a volunteer is in charge of personal information about you. This means the Trust is the Data Controller.

### **The postal address of the Trust is:**

**Nene Education Trust  
Mountbatten Way  
Raunds  
Wellingborough  
Northants NN9 6PA**

Tel **01933 627081**

Email **[enquiries@neneeducationtrust.org.uk](mailto:enquiries@neneeducationtrust.org.uk)**

If you would like to contact us about the personal data and information we hold on your behalf please contact our Data Protection Officer:

Angela Corbyn on 07775 436141; email [dpo@neneeducationtrust.org.uk](mailto:dpo@neneeducationtrust.org.uk) or leave a letter at our offices at the address above.

### **The personal data we hold**

We process data relating to those volunteering at the Nene Education Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Governance details (such as role, start and end dates and governor ID)

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements
- Photographs and CCTV images captured in school or at the Trust
- 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.

### **Why we use this data**

The purpose of processing this personal data is essential in order for Nene Education Trust to fulfil their official functions and meet legal requirements:

- Establish and maintain effective governance
- Meet statutory duties placed upon us for publishing and sharing Member/Trustee/Governor details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them
- 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.

### **Use of your personal information for marketing purposes**

Where you have given us consent to do so, Nene Education Trust may send you marketing information by email or text promoting Trust events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or ‘opt out’ of receiving these texts and/or emails at any time by clicking on the “Unsubscribe” link at the bottom of any such communication

## **Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest
- The Trust (and the schools within it) is under a legal obligation to collect the information or the information is necessary for us to meet legal requirements imposed upon us by Company Law and Charity Law and to meet legal requirements imposed upon us such as our statutory duties in respect of governance and such as our duty to safeguard pupils.
- It is necessary for us to hold and use your information for the purposes of our functions in establishing and maintaining effective governance across the Academy Trust. This is a function which is in the public interest because governance is an integral part of leadership and management of Multi Academy Trusts and schools. This means we have a real and proper reason to use your information.
- There is a substantial public interest in disclosing your information because it is necessary to keep our pupils safe from harm.

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

All Multi Academy Trusts, under the Academy Financial Handbook have a legal duty to provide the governance information as detailed above.

### **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 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 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

### **Collecting this data**

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide 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.

### **How we store this data**

Personal data is stored in accordance with our Data Protection and FOI policy

We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the Nene Education Trust.

When your relationship with the Nene Education Trust has ended, we will retain and dispose of your personal information securely in accordance with our record retention schedule management policy.

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.

### **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies (e.g. DfE, ESFA, GIAS) – to meet our legal obligations to share information about Member/Trustee/Governor
- Our local authority – to meet our legal obligations to share certain information with it, such as details of governors
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as Member/Trustee/Governor support
- Our auditors
- Companies House and the Charity Commission - Your information will be published in accordance with Company Law and Charity Law requirements.
- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts
- Disclose on Trust and schools websites relevant governance information
- 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

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### **Your rights**

#### **How to access the personal information we hold about you**

Individuals have a right to make a 'subject access request' to gain access to personal information that the Nene Education Trust holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for

- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have a 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 our data protection officer.

### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

### **How the Government uses your data**

The governance data that we lawfully share with the DfE via GIAS:

- will increase the transparency of governance arrangements
- will enable maintained schools and academy trusts and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allows the department 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

### **Data collection requirements**

To find out more about the requirements placed on the Trust by the Department for Education including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

**Note:** Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to a small number of DfE staff

who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the department, unless the law allows it.

### **How to find out what personal information DfE hold about you**

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact DfE: <https://www.gov.uk/contact-dfe>

### **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 with the Trust Central Team Office.

To make a complaint, please contact our Data Protection Officer

Angela Corbyn on 07775 436141; email [dpo@neneeducationtrust.org.uk](mailto:dpo@neneeducationtrust.org.uk), or leave a letter at our offices at the address above.

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

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

## 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:

Angela Corbyn on 07775 436141; email [dpo@neneeducationtrust.org.uk](mailto:dpo@neneeducationtrust.org.uk), or leave a letter at our offices at the address above.

Nene Education Trust UK-GDPR queries please contact:-  
Victoria Brennan, Trust GDPR Lead 01933 400549  
[vbrennan@neneeducationtrust.org.uk](mailto:vbrennan@neneeducationtrust.org.uk)

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