# Hamwic Education Trust &
# Bearwood Primary and Nursery School
# Director / Governor/ Volunteer Privacy Notice

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## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school and the Hamwic Education Trust (HET) uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage to work at our school including job applicants.

Our Trust, Hamwic Education Trust is the 'data controller' for the purposes of UK data protection law.

Our Trust Data Protection Officer is Gemma Carr (see 'Contact us' below).

Our school Data Compliance Officer is Peter Leddin (see 'Contact us' below).

## 2. The personal data we hold

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
- Detail required to carry out an enhanced DBS check including photographic ID, proof of address, date of birth, birth certificate

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements
- Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

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.

## 3. Why we use this data

We use the data listed above to:

a) Establish and maintain effective governance

b) Meet statutory obligations for publishing and sharing Director/Governors' details

c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

d) Undertake equalities monitoring

e) Ensure that appropriate access arrangements can be provided for volunteers who require them

### 3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

### 3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## 4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- the 'public task' basis – we need to process data to fulfil our statutory function as a school as set out here:
  - Education Act
- the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:
  - Keeping Children Safe In Education (KCSIE)
  - Health & Safety At Work Act 1974
- the 'consent' basis – we will obtain consent from you to use your personal data
- the 'vital interests' basis – we will use this personal data in a life-or-death situation

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 would go about withdrawing consent if you wish to do so.

### 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 the conditions we may rely on for processing special category data are:

- We have obtained your explicit consent to use your personal data in a certain 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
- We need to process it for reasons of substantial public interest as defined in legislation

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and the condition we may rely on for processing criminal offence data is:

- We need to process it for reasons of substantial public interest as defined in legislation

## 5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

## 6. How we store this data

We keep personal information about volunteers while they are in their role. We may also keep it after they have left their role if this is necessary. Our record retention schedule sets out how long we keep information about volunteers.

If you would like a copy of the record retention schedule, please contact your school office.

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.

## 7. Who we share data with

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

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

- Our local authority BCP Council – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, Ofsted
- Suppliers and service providers:
  - Management Information Services
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

### 7.1 Transferring data internationally

We may share personal information about a volunteer with the following international third parties, where different data protection legislation applies:

- Other schools or educational establishments
- App or cloud server providers

Where we transfer personal data to a third-party country or territory, we will do so in accordance with UK data protection law and on the basis of an adequacy regulation by the UK government.

In cases where we have to set up safeguarding arrangements to complete this transfer, a copy of these arrangements can be accessed by contacting us.

## 8. Your rights

### 8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. These requests will be free of charge. Any requests must be made to the school's DCO or the Trust's DPO (see 'Contact Us'). A response to any such request will be processed within one month from the date on which the request was received.

### 8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

## 9. 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.

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

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

### 10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact;

- Gemma Carr, Data Protection Officer, Hamwic Education Trust, Unit E, The Mill Yard, Nursling Street, Southampton, SO16 0AJ. Email: compliance@hamwic.org

However, our school Data Compliance Officer has day-to-day responsibility for data protection issues in our school.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them:

- Peter Leddin, Business Manager, Bearwood Primary and Nursery School, Barons Road, Bearwood, Bournemouth, Dorset, BH11 9PB. Telephone: 01202 590703 or Email: school@bearwood.poole.sch.uk.