Claypool Primary School

Privacy Notice for Volunteers

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data. Claypool Primary School is required by law to collect and process personal information about our volunteers. We are committed to being transparent about how we collect and use this information and to meet our data protection obligations.

This privacy notice explains how we collect, store and use personal data about our volunteers in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

Who are we?

We are Claypool Primary School. Our registered office is Claypool Primary School, Salisbury Road, Horwich, Bolton, BL6 6LN. The school is the 'data controller' for the purposes of data protection law and is registered with the Information Commission.

Claypool Primary School has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

The school's Data Protection Officer is Gill Smith.

What data do we collect?

We collect and process a range of information about our volunteers. Information that we may collect, use, store and share (when appropriate) includes, but is not restricted to:

- Personal information such as name, date of birth, address, email address, phone numbers, emergency contact details, marital status, date of birth.
- Application information (including social media checks, safe recruitment checks, references and other information included in a CV or cover letter or as part of the application process, evidence of qualifications, information relating to other volunteering activities in a regulated activity role)
- Any additional information recommended in the most recent Keeping Children Safe in Education document.
- Information about your use of our information and communications systems.
- Photographs.

What sensitive information do we collect?

We may also collect, store and use the following more sensitive types of personal information (known as 'special category data') including:

- Information about your health, including any medical conditions.
- Information about criminal convictions and offences.

How do we collect this information?

The school may collect this information in a variety of ways. For example, information might be collected through application forms, obtained from your passport or other ID documents, forms completed by you at the start of or during your time volunteering, from correspondence with you, through interviews, meetings or assessments.

The school may also collect information about you from third parties, such as from references, and information from criminal records checks permitted by law.

At Claypool Primary School references that have been given or received for education, training, employment, volunteering, or service provision are classed as being **confidential.** Under UK GDPR and the Data Protection Act 2018, confidential references are generally exempt from Subject Access Requests (SARs)**.** Under the Data Protection Act 2018 (Schedule 2), the exemption covers both the previous employer (who wrote it) and the new employer (who received it).

Why do we collect this data?

We have set out below a description of all the ways we plan to use volunteers' information and which of the legal bases we rely on to do so. Some of the reasons for collecting and using your personal data overlap, and there may be several grounds which justify our use of this data.

- (UK GDPR) Article 6(1)(c) – Necessary to comply with our legal obligations
- (UK GDPR) Article 6(a)(e) – Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- (UK GDPR) Article 6(1)(f) – Necessary for our legitimate interests to run the school

- UK Employment and Childcare Law including those in relation to:
    - School Staff (England) Regulations 2009 (as amended)
    - Safeguarding Vulnerable Groups Act 2000
    - The Childcare (Disqualification) Regulations 2009
    - Keeping Children Safe in Education
    - Under section 538 of the Education Act 1996, we are required to provide certain information we hold about our volunteers and governance arrangements to the Secretary of State for Education

Purpose/activity	Type of Information	Lawful basis for processing information
To make a decision about your recruitment or appointment as a volunteer	• Contact details and personal details • Qualifications and experience • Recruitment information	• Performance of a task carried out in the public interest • Necessary to comply with our legal obligations
To verify your identity	• Contact details and personal details • Companies House personal codes	• Necessary to comply with our legal obligations
For education, training and development requirements	• Contact details and personal details • Training records	• Necessary to comply with our legal obligations • Performance of a task carried out in the public interest
To monitor your use of our information and communication systems to ensure compliance with our safeguarding and data security policies	• Contact details and personal details • Details of ICT use	• Necessary to comply with our legal obligations • Necessary for a recognised legitimate interest • Necessary for our legitimate interests to run the school, the provision of IT services and ensure network security
To ensure network and information security, including preventing unauthorised access to our computer and electronic communication systems and preventing malicious software distribution	• Contact details and personal details • Details of ICT use	• Necessary for our legitimate interests to run the school, the provision of IT services and ensure network security

Why do we collect and process sensitive information?

We have set out below a description of all the ways we plan to use more sensitive "special category data" of our volunteers, and which of the legal bases we rely on to do so. Some of the reasons listed below for collecting and using your personal data overlap, and there may be several grounds which justify our use of this data.

- Article 9(2)(c) - Vital interests
- Article 9(2)(b) - Necessary to comply with our legal obligations
- Article 9(2)(g) - Necessary for the performance of a task in the public interest

- UK Childcare Law including those in relation to:
    - Keeping Children Safe in Education
    - Crime and Policing Act 2026

Purpose/activity	Type of Information	Lawful basis for processing information
To comply with health and safety obligations	• Contact details and personal details • Health and medical information	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To make reasonable adjustments	• Contact details and personal details • Health and medical information	• Necessary to comply with our legal obligations • Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To comply with safeguarding legislation in relation to a regulated activity	• Criminal convictions	• Necessary to comply with our legal obligations
To ensure dietary needs are catered for	• Medical information	• Vital interests • Necessary to comply with our legal obligations

The use and withdrawal of consent

Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn. If you change your mind, or you are unhappy with or use of your personal data, please let us know by contacting our Data Protection Officer or Head Teacher.

Storing personal data

We keep your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of personal information are available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

Who do we share information with?

We routinely share your information with:

- Our local authority
- The Department for Education and/or EFSA
- Ofsted
- Our auditors, insurers and other professional advisers
- Police forces, courts
- Other third parties we may engage the services of for the purposes of providing a public task or the administration of the school, for example our safeguarding monitoring software, our management information system provider.

- Other third parties to whom we may choose to transfer or merge parts of the school or our assets. Alternatively, we may seek to acquire other trusts, schools or academies or merge with them. If a change happens to the school, then the new management team may use your personal information in the same way as set out in the privacy notice.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To comply with our legal obligations.
- To contact your family or representatives to protect yours or their vital interests.

Why do we share volunteers' information?

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.
Local authority - we are required to share information about our voluntary workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE) - we share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins voluntary workforce monitoring and evaluation.

Data collection requirements - the DfE collects and processes data relating to the voluntary workforce in schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The department may share information to promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:
https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

To contact the department: https://www.gov.uk/contact-dfe

International transfers of personal data

Your personal information may be transferred outside the UK and the European Economic Area ('**EEA'**), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by conducting a transfer risk assessment to ensure that security measures and other appropriate safeguards are in place to protect your information. For more information on international transfers please contact us at the details below.

Your rights

Data protection law gives you certain rights about how their information is collected and used. To make a request for your personal information, please contact our Data Protection Officer by emailing gill@mindography.co.uk or the Head Teacher office@claypool.bolton.sch.uk

Under data protection law, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commission if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- the right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- the right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- the right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

How to access personal information we hold about you

Individuals have a right to make a **'subject access request'** to gain access to personal information that the school 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 the 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 or Head Teacher. You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

At school references that have been given or received for education, training, employment, volunteering, or service provision are classed as being **confidential.** Under UK GDPR and the Data Protection Act 2018, confidential references are generally exempt from Subject Access Requests (SARs)**.** Under the Data Protection Act 2018

(Schedule 2), the exemption covers both the previous employer (who wrote it) and the new employer (who received it).

Complaints

If you have a concern about the way we are collecting or using your personal information, you have the right to make a complaint to us. Any complaints relating to data protection must be directed to our Data Protection Officer or the Head Teacher. Data protection complaints will be dealt with in accordance with the procedure set out in our Data Protection Complaints Policy.

If you remain dissatisfied with our response, you can make a complaint directly to the Information Commission at - Make a complaint about how an organisation has used your personal information | ICO.

Contact us

If you have any questions about this privacy notice or the way in which we use your personal information, please contact our Data Protection Officer or insert school contact:

Data Protection Officer	Mrs Gill Smith	email: gill@mindography.co.uk
Head Teacher	Mrs Amanda Hulme	email: office@claypool.bolton.sch.uk

Appendix 1 – Third party processors with whom we share data

Third parties which we engage the services of for the purposes of providing a public task or the administration of the Trust, for example our safeguarding monitoring software, our management information system provider, curriculum software packages, etc

Name of provider	Purpose of data sharing	Web link
Arbor/MIS system	Management information system	Keeping your data safe: https://arbor-education.com/about-us/data-protection-gdpr/
Please insert all 3rd party processors used in school/trust and/or delete from list below		
Online SCR provider		