



## **KNAPHILL FEDERATION OF SCHOOLS**

### **Privacy Notice for Volunteers**

**Knaphill Federation of Schools** (Knaphill School and Knaphill Lower School) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all current and former volunteers.

#### **Who Collects This Information**

**Knaphill Federation of Schools** 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, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

#### **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.

#### **The Categories of Information That We Collect, Process, Hold and Share**

Knaphill Federation of Schools holds the legal right to collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to Article 6 and Article 9 of the GDPR.

Personal data that we may collect, store, use and share (when appropriate) about the workforce includes, but is not restricted to:-

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- Criminal records information as required by law to enable you to volunteer to work with children;
- Information on grievances raised by or involving you;
- Information on conduct and/or other disciplinary issues involving you;
- 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 volunteers captured by the Knaphill Federation of Schools CCTV system or photographs;
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within the Knaphill Federation of Schools, you will be notified separately if this is to occur); and
- Details in references about you that we give to others.
- Disability and access requirements

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### **How We Collect This Information**

We may collect this information from you, the DBS, other professionals we may engage (e.g. to advise us generally), automated monitoring of our websites and other technical systems such as our computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

This data is essential for Knaphill Federation of Schools and the Local Authority's operational use. Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

### **How We Use Your 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 fulfil the contract 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 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.

We need all the categories of information in the list above primarily to allow us to fulfil our contract with you and to enable us to comply with legal obligations. Please note that we may process your information without your knowledge or consent, where this is required or permitted by law.

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

- To maintain DBS records;
- To comply with regulatory requirements and good practice;
- To carry out vetting and screening of applicants to volunteer in accordance with regulatory and legislative requirements;
- In order to manage internal policy and procedure;
- Evidence for possible disciplinary or grievance processes;
- Complying with legal obligations;
- To monitor and manage access to our systems and facilities in order to protect our networks, the personal data of our volunteers and for the purposes of safeguarding;
- To monitor and protect the security of our network and information, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution;
- Education, training and development activities;
- To monitor compliance with equal opportunities legislation;
- To answer questions from insurers in respect of any insurance policies which relate to you;
- Health and safety obligations;
- Prevention and detection of fraud or other criminal offences; and
- To defend the Knaphill Federation of Schools in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

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If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

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 Particularly Sensitive Information**

Sensitive personal information (as defined under the 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;
- 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: -

- To comply with employment and other laws;
- Collecting information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### **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. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

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 volunteering for us.

## **Sharing Data**

### **Department for Education (DfE)**

We share personal data with the Department for Education (DfE) on a statutory basis.

Where it is legally required or necessary (and it complies with data protection law), we may share personal information about you but is not limited to the following: -

- Ofsted;
- Other schools within the Federation;
- Prospective Employers;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- LADO;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security);
- DBS;

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- Recruitment and supply agencies.

All data is transferred securely and held by DfE under a combination of software and hardware controls that meet the current [government security policy framework](#).

We may transfer your personal information outside 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 School 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.

Once your volunteering period with us has ended, we will retain this file and delete the information in it in accordance with our records retention schedule.

### **Requesting access to your Personal Data**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact [DataEnquiry@kfos.co.uk](mailto:DataEnquiry@kfos.co.uk).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us by emailing [DataEnquiry@kfos.co.uk](mailto:DataEnquiry@kfos.co.uk) in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **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 email [DataEnquiry@kfos.co.uk](mailto:DataEnquiry@kfos.co.uk)

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.

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 contacting [DataEnquiry@kfos.co.uk](mailto:DataEnquiry@kfos.co.uk) then you can contact the DPO on the details below: -

Data Protection Officer Name: Craig Stilwell

Data Protection Officer Details: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Data Protection Officer Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

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.

### **Contact**

If you would like to discuss anything in this privacy notice, please email [DataEnquiry@kfos.co.uk](mailto:DataEnquiry@kfos.co.uk)

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### **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.