

drb Ignite Multi Academy Trust

PRIVACY NOTICE FOR MEMBERS, TRUSTEES AND VOLUNTEERS

Introduction

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that it holds about them. The Trust complies with this right by providing *privacy notices*, sometimes called *fair processing notices*, to individuals where the Trust is processing their personal data.

This privacy notice explains how the Trust collects, stores and uses personal data about individuals employed, or otherwise engaged, with the Trust.

drb Ignite Multi Academy Trust is the *data controller* for the purposes of data protection law.

The Trust's data protection officer is Alvin Walters.

The personal data the Trust holds

[ICO's definitions of 'personal data' and 'special categories of personal data'](#)

The Trust processes data relating to those employed, or otherwise engaged, in Trust work. Personal data that the Trust may collect, use, store and share (when appropriate) about individual's includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Information about business and pecuniary interests

The Trust may also collect, store and use information that falls into **special categories** of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership

- Disability and access requirements.

Why the Trust uses this data

The Trust uses an individual's data to:

- establish and maintain effective governance
- meet statutory obligations for publishing and sharing member/trustee/volunteer details
- facilitate safe recruitment as part of our safeguarding obligations towards pupils
- undertake equalities monitoring
- ensure that appropriate access arrangements can be provided for members, trustees and volunteers who require them.

The Trust's lawful basis for using data

[*ICO's guidance on the lawful basis for processing.*](#)

The Trust only collects and uses personal information when the law allows it to. Most commonly, the Trust uses it where it needs to:

- fulfil a contract it has entered into with an individual
- comply with a legal obligation
- carry out a task in the public interest

Less commonly, the Trust may also use personal information about an individual where:

- the individual has given consent to use it in a certain way
- the Trust needs to protect an individual's vital interests (or someone else's interests)
- the Trust has legitimate interests in processing the data

Where an individual has provided the Trust with consent to use data, the individual may withdraw this consent at any time. The Trust will make this clear when requesting consent and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using personal information overlap, and there may be several grounds which justify the Trust's use of an individual's data.

Collecting information

While the majority of information the Trust collects from an individual is mandatory, there is some information that individuals can choose whether or not to provide.

Whenever the Trust seeks to collect information, it will make it clear whether an individual must provide this information and if so, what the possible consequences are of not complying, or whether the individual has a choice.

How the Trust stores data

The Trust keeps personal information about members, trustees and volunteers while they are working with the Trust. The Trust's [Retention of Record Schedule \(GDPR DOC 2.3A\)](#) sets out how long it keeps information about individuals.

Data sharing

The Trust does not share information about individuals with any third party without consent unless the law and Trust policies allow.

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

- Government departments or agencies – to meet the Trust's legal obligations to share information about members/trustees/volunteers
- The local authority, DfE, ESFA – to meet the Trust's legal obligations to share certain information such as details of trustees
- Suppliers and service providers – to enable them to provide the service the Trust has contracted them for, such as trustee training
- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts

Transferring data internationally

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

An individual's rights

How to access personal information the Trust holds

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

If an individual makes a subject access request, and if the Trust does hold information about an individual, it will:

- provide the individual with a description of it
- tell the individual why it is holding and processing the information, and how long it will keep it
- explain where the information came from, if not from the individual
- tell the individual who it has been, or will be, shared with
- let the individual know whether any automated decision-making is being applied to the data and any consequences of this
- give the individual a copy of the information in an intelligible form

An individual may also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If an individual wants to make a request, they should contact the Trust's data protection officer.

Other rights

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

- object to the use of personal data if it would cause, or is causing, damage or distress
- prevent their data being used for direct marketing
- object to the use of their 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, 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, the Trust's data protection officer should be contacted.

Complaints

The Trust takes any complaints about information collection and use of personal information very seriously.

If an individual is concerned that the Trust's collection or use of personal information is unfair, misleading or inappropriate, or has any other concern about the Trust's data processing, this should be raised with the Trust's DPO in the first instance.

Contact the Trust's data protection officer;

- Alvin Walters (dpo@drbignitemat.org)
- Address: 3 Brindleyplace, Birmingham B1 2JB

Alternatively, an individual may 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


This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way the Trust uses data.

Document Control

The Trust's Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to on the Trust website and is published 20th August 2020.

This procedure was approved by the Chief Executive Officer (CEO) or Trust Chair and is issued on a version-controlled basis under his signature.

Name	Signature	Date
Robert Bowater		20/8/20

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Richard Martin	24/5/2018
2.	Review	Rob Bowater	25/2/19
3.	Review	Rob Bowater	20/8/20