Privacy notice for volunteers including those in governance

This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018, and the modernised framework of the Data (Use and Access) Act 2025 (DUAA).

It applies to volunteers including those in governance.

Who Collects this Information

Initio Learning Trust 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 policies referenced in this privacy notice, to be aware of how we process your personal data.

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.

Categories of Information We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you:

- 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;
- Education details;
- DBS details;
- Employment details;
- Information about business and pecuniary interests;
- Information acquired as part of your application to become a governor;
- Criminal records information as required by law to enable you to work with children;
- Information about your use of our IT, communications and other systems, and other monitoring information;
- Photographs;

- Images captured by the Trust's CCTV system;
- Video recordings captured by the Trust's video conferencing platform;
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;
- Details in references about you that we give to others.

How We Collect this Information

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

We may collect this information from you directly, or from a number of third-party sources, such as other employees, the DBS, technical networks and so on.

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 you have provided your consent;
- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation (such as health and safety legislation and under statutory codes of practice);
- 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;
- Where it is necessary for the purposes of a "Recognised Legitimate Interest" under the Data (Use and Access) Act 2025 (such as safeguarding vulnerable people or the prevention and detection of crime).

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

- To determine appointment and suitability as a volunteer including those in governance;
- To deal with election of those in governance;
- To comply with safeguarding obligations;
- To provide details on our website or online databases about those in governance;
- To communicate with third parties and other stakeholders to the Trust;
- For business management and planning purposes (including accounting, budgetary and health and safety purposes;
- For financial purposes (such as expenses);
- To deal with any complaints/investigations as required;

- When you sit on a panel or committee, name and comments as well as decisions made;
- To send communications in your role ;
- For education, training and development requirements;
- In order to review governance of the Trust;
- In order to comply with any legal dispute or any legal obligations;
- In order to comply with regulatory requirements or health and safety obligations;
- To ensure system security, including preventing unauthorised access to our networks;
- To monitor use of our systems to ensure compliance with our IT processes;
- To receive advice from external advisors and consultants;
- To liaise with regulatory bodies (such as the DfE, DBS); and
- Dealing with termination of your appointment;

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure health and safety). Where you have provided us with consent to use your data, you may withdraw this consent at any time.

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 UK GDPR as "special category data") requires 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
- 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.

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.

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 working for us.

Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following:

- Government departments or agencies
- The Local Authority
- Suppliers and Service providers
- Professional advisors and consultants
- The Department for Education
- Law enforcement
- Support services;
- DBS.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK. 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 Trust 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, or as necessary to resolve disputes.

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances by law, you have the right to:

- **Access your personal information** (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you.

Please note that under the Data (Use and Access) Act 2025, the Trust is only legally obligated to provide confirmation and personal data that can be located following a reasonable and proportionate search for the requested information.

- **Correction of the personal information we hold about you.** This enables you to have any inaccurate information we hold about you corrected. Please note that where records reflect historical events, professional opinions, or safeguarding reports, these represent a factual record of what was reported or understood at that specific time. In these circumstances, the Trust cannot erase or alter the original historical record. Instead, we will fulfil your right to rectification by appending a supplementary statement to the file.
- **Erasure of your personal information**. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it. Please note that this is not an absolute right. The Trust cannot erase personal data where we are required by law to retain it (for example, statutory pupil records, attendance registers, or safeguarding files), or where it is necessary for the performance of a task carried out in the public interest.
- **Restriction of processing your personal information.** You can ask us to suspend processing personal information about you in certain circumstances.
- **To object to processing in certain circumstances.** Please note: You have an absolute right to object to your data being used for direct marketing.
- **To challenge significant decisions** made about you based solely on automated processing, and obtain human intervention.
- **To transfer your personal information** to another party.

If you want to exercise any of the above rights, please contact your relevant school's Headteacher, or the Data Protection Officer. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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 notify the school office. 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.

How to Raise a Concern

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 the relevant school's Headteacher or their delegate, then you can contact the DPO on the details below:

Data Protection Officer: Tracy Broadbent

- Address: Allenbourn Middle Trust, East Borough, Wimborne, BH21 1PL
- Email: privacy@initiolearning.org
- Telephone: 07761 045361

If your concern amounts to a formal complaint regarding the Trust's handling of your personal data, it will be managed in accordance with our statutory obligations. The Trust will acknowledge your data protection complaint without undue delay and the Data Protection Officer will provide a formal written outcome within one calendar month of receipt, as outlined in our main Data Protection Policy.

You also have the right to make a complaint at any time to the Information Commission, the UK supervisory authority for data protection issues.

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

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.