Volunteer Privacy Notice

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Our Volunteer Privacy Notice: protecting and respecting your information

Introduction About us

Focus-Trust is a charitable multi-academy trust based in the North West of England and are dedicated to working with our 15 primary schools. It is the core purpose of Focus-Trust to continually strive to be a learning organisation, where the learning of all children and adults is valued and promoted. Without our supporters and volunteers, we could not carry on with the work that we do.

We take our Data Protection responsibilities very seriously, with regard to the personal data that is shared with us. We promise to keep this safe and secure and use it for the purposes for which it was collected and not do anything that wouldn't be reasonably expected or is not allowed under legislation.

Who we are

For the purpose of the Data Protection Requirements * the Data Controller is Focus Academy Trust (UK) Ltd, Ram Mill Business Centre, Office 7, First Floor, Gordon Street, Chadderton, Oldham, OL9 9RH.

Registered as a Data Controller with the ICO: Ref Z3474517.

Contacting Us

If you want to request further information about this privacy policy or exercise any of your rights, please contact our Data Protection Officer on 07867 423 870 leaving a message with you name and contact details or by email to info@focus-trust.co.uk and the DPO will respond to you.

Our commitment to you

We are committed to protecting and respecting your privacy, and we take your privacy very seriously.

This privacy notice informs you as to how Focus School Trust (FT) uses and looks after the personal information of our volunteers, what your privacy rights are and how the law protects you. As a valued volunteer you need to be clear and comfortable with how we collect your personal information and what we do with it.

Objective

The objective of this notice is to give a clear explanation of what personal information we collect and how we collect, use and protect personal information.

Scope

This notice applies to our volunteers.

This privacy notice provides details about:

- Your data protection rights as an individual
- The information we collect and use
- Why we share information about you
- How long we keep information about you
- Your rights as an individual
- We feel it is important that you are aware of your rights as an individual.
- Complaints

Responsibilities

This notice has been designed to ensure that the data managed by the organisation is protected at all times, along with the privacy of all individuals connected with Focus Trust.

Your Data Protection Rights

We take the protection of your personal data very seriously and respect your privacy in accordance with data protection legislation and best practice. You have rights relating to your personal information. You can find more information about your privacy rights on the Information Commissioner's Office website www.ico.org.uk.

You have certain rights in relation to your personal information, although those rights will not apply in all cases or to all the information that we hold about you. For example, we may need to continue to hold and process information to establish, exercise or defend our legal rights.

You have the right to be informed about how and why we process your personal information and any time you give us personal information you have the right to be informed about why we need it and how we'll use it.

You can find most of the information you need in this Privacy Notice.

You have a right of access to your own information

You have a right of access to any of your personal data that we hold about you. You can contact us at any time to gain information about what data we hold about you and why we hold it. Please contact the Data Protection Officer at Focus-Trust through the above channels for further information about how we comply with this right.

If you make a formal request, we will respond to acknowledge your request and will first require you to prove your identity. We may also ask you for information about any specific information you are seeking to help us make sure we meet your request fully and speed up the process.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

We will provide you the information that you are entitled to as soon as possible and without unreasonable delay and at the latest within one month of your identity being verified by us.

In exceptional cases we may extend the period of compliance by a further two months if the request(s) are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary. In most cases there will be no charge made for this right of this access.

To make a request for any personal information we may hold we would ask that you contact our Data Protection Officer through the above channels.

You have the right to ask us to correct inaccurate personal information

If you believe information we hold about you to be inaccurate or incomplete, you can ask us to correct it or complete it at any time e.g. the spelling of your name or your contact information.

You also have the right to ask for our processing of your personal data to be restricted. For example, if you are contesting the accuracy of data we are using about you. In such case we will restrict our processing while we verify the accuracy of the data that we hold.

You can ask for certain information about you to be deleted

You can also ask for certain information about you to be deleted. For example, if you are moving out of the area.

In certain cases, we will be unable to delete your information if there are statutory grounds to retain it (i.e. HMRC, Safeguarding purposes or other legal requirements).

You have the right to data portability

You have the right to data portability where processing is automated, although we don't currently carry out any such processing. If we do in future, you can make a request and this data can be exported from our systems for you.

What information we collect about you

If you volunteer with FT, you may be referred to in a variety of documents and electronic records, including your volunteer profile on our volunteer database.

Some of these records are produced by you, such as your volunteer application form. Others are produced by us recording information you have provided to us, or the activity you undertake with us.

We may sometimes collect additional information from third parties, including former employers in the form of a reference, or when we need to carry out a Disclosure and Barring Service (DBS) check if your role is a regulated activity i.e. working in one of our services with young people.

We have a wide range of volunteering roles and some roles require more personal information to be processed than others. We are always striving to better understand our volunteers, to provide you with a better experience with us. To achieve this, we analyse and research information we have on our volunteers on our database, to group people together in terms of common characteristics. This enables us to better tailor the information we provide to ensure it is relevant and interesting. We do this as we have a legitimate interest in improving your experience as a volunteer.

We have set out below, in a table format, the ways we collect and use your personal information for certain purposes and how it might sometimes be shared with others:

	Volunteer roles	**Information obtained**	**Purpose**	**Shared with third parties**
1.	All roles	Personal contact details, including name, address, telephone, email	To contact volunteers about their application and if successful their volunteering role	Our online MIS system
2.	All roles	Emergency contact details	To be able to contact family or a friend in an emergency	As above
3.	All roles	Communication preferences and any marketing preferences.	To be able to contact volunteers with information about the difference we are making together and how else they can get involved	As above
4.	All roles	Date of Birth	To ensure all volunteers meet our minimum age requirements and to monitor the age demographics of our volunteer base	As above
5.	All roles	Information about any criminal convictions or cautions relating to children and young people	To help make a decision about suitability for volunteering role and association with FT	As above
6.		Two references	To be contacted to confirm volunteer's identity and suitability for the volunteer role	As above
7.		Job history summary	To review previous work history as part of our safer recruitment procedures	No
8.		Enhanced DBS check	To undertake and assess the risk around any previous criminal history	DBS check service provider
9.		Information about support needs or any reasonable adjustments necessary and if necessary an individual risk assessment	To understand what extra provision the prospective volunteer might need to undertake the role successfully	No

10.		Photo	To volunteer ID card	ID card supplier
11.		Personal profiling information (gender, ethnicity, disability)	To be aggregated anonymously into statistics about our volunteers demographics for monitoring purposes and reported to funders	No
12TH.		Volunteer 1:1 supervision / support notes	To review volunteer performance, experience, safeguarding, learning needs	No

We may also collect from you:

- Information about your race or ethnicity, religious beliefs, and sexual orientation may be used anonymously only for equal opportunity monitoring to better understand our volunteers and where we may need to improve our diversity and inclusion practices.
- Information about your support needs and health, including any relevant medical condition will be used to comply with our health & safety obligations and enable any reasonable adjustments to be made.
- Information about criminal convictions and offences as part of the volunteer recruitment process when a volunteering role requires this.

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.

On rare occasions we may have to process your personal information without your knowledge or consent, for example in compliance with our legal requirements regarding HMRC etc. From time to time that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Artificial Intelligence (AI)

Focus-Trust recognise the rapid development and use of Artificial Intelligence (AI) tools within education. AI should enhance teaching and pupil learning if used transparently and ethically. For further details on how we use AI please see our AI Policy.

Failure to provide information

If you do not provide certain information when requested, we may be unable to deliver on some elements of the volunteering arrangement or, in some circumstances, to comply with our legal obligations (such as to ensure the health and safety of our volunteers, workers or beneficiaries). In such instances we will inform you about the implications of the decision and whether we are able to continue with the volunteering arrangement.

Legal basis for using your personal information

FT relies on the following legal conditions that are described in the UK General Data Protection Regulation to use your personal information in the ways described in this privacy notice:

1) Legitimate interest: where we have a legitimate interest to do so in support of FT's aims as an Academy Trust. We also have a legitimate interest in being able to use and process personal information for internal administrative purposes, and when it is necessary to protect our IT network, data security and ourselves (and our schools and volunteers) from risks such as fraud, criminal conduct or reputational damage.

   When processing your personal information based on a legitimate interest, we will make sure that it is exercised proportionately and is always balanced against the privacy rights and other legal rights you have as an individual.

2) you give us your explicit consent to do so

3) the processing is necessary to protect your vital interests or someone else's vital interests, e.g. where the data subject is physically or legally incapable of giving consent

4) the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

5) if we process any special categories of information i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, processing of genetic or biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sex life or sexual orientation, we must have a further lawful basis for the processing;

6) We may use special category personal information about you without your consent only in such instances where:

   - we need to protect your vital interests (or those of someone else) in an emergency
   - we have a need to use such information in connection with a legal claim
   - you have already made such information public, such as religious or philosophical beliefs or political opinions.

Communicating with you

Administrative communications

We will communicate with you as required to initially process your volunteer application and then, as an active volunteer, to provide you with the support and information you need to undertake your volunteer role. Where your role requires it, this will include information about our work, case studies and other ways that people can support us. We will do this as we have a legitimate interest in supporting your volunteering role. You will also receive administrative communications from our Volunteering Team that are related to your volunteering such as a welcome email, volunteer survey and thank you communications.

Newsletters and update communications

We may send you information about our work, the difference you are making and how you can get further involved. You will receive additional emails and possibly text communications from us including our school newsletter. You may also receive information about how you can further support our work through raising awareness, campaigning or financial support. We will try to tailor the information you receive to reflect what we think you will be interested in on the basis of the information we hold about you.
We may send you similar information by post or ring you, unless you have previously opted out of being contacted in this way or you are registered with the Telephone Preference Service.

You can update your preferences to change what information you receive from us at any time, for example you can opt-out if you no longer want to receive this information. To do so please contact

the school business manager at the school you are volunteering at or info@focus-trust.co.uk

Information we share with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the volunteering relationship with you; where we have another legitimate interest in doing so; or you have specifically agreed that we may share your personal information with them: The following volunteer-related activities are carried out for us by third-parties:

- Your referees provide a reference for your volunteering with us
- Our ID card scheme provider issues ID cards for volunteers
- Any FT DBS umbrella body

We may disclose aggregate statistics about our volunteers to describe our services and operations to prospective partners, prospective supporters, other reputable third parties and for other lawful purposes. These statistics do not include any information that identifies people.

How we keep your information and who has access to it

Your information is held on systems that are maintained and managed securely by Focus-Trust. We ensure that there are technical controls in place to protect your personal details.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We use trusted external companies to collect or process some data on our behalf. We do extensive checks on these companies before we work with them and put a contract and data protection agreement in place prior to any work taking place, that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

On occasions we may need to disclose your details if required, to the police, regulatory bodies or legal advisors. You may not be informed when this happens.

Wherever possible we store our information about volunteers in the UK or within the European Union (EU).

How long we store personal information

We will only use and store personal information for as long as it is required for the purposes it was collected for.

We have a data retention policy (available on request) that sets out the different periods we retain personal information in accordance with our duties under applicable data protection law and various legislative requirements. Some personal information may be retained by us in archives for historical research purposes and we do this in a manner that complies with applicable data protection law. We continually review what personal information and records we hold and delete what is no longer required.

Requests to access or stop using your data

You have a right to ask us to stop processing your personal data, and assuming that it's not essential for the purpose you provided it for (e.g. processing a donation or recording your access to one of our schools etc), we will do so. Please contact the schools business manager at the school or info@focus-trust.co.uk if you have any concerns.

You have a right to ask for a copy of the information we hold about you. This is known as a Subject Access Request. See the above section on your rights for further details. If you would like to access your information, then please speak to us directly. We may ask for written confirmation of the request, just to confirm your identity.

Making a complaint

Focus-Trust strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. We understand in line with the Data Use and Access Act we must take steps to help you if you wish to make complaint about how we use your personal information. We will supply an electronic form, acknowledge your complaint within 30 days and respond to it without undue delay.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of the collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to: our Data Protection Officer on 07867 423 870 or by email to info@focus-trust.co.uk.

If you believe that Focus-Trust has not complied with your data protection rights, you can complain to the Information Commissioner's Office, their address is Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by calling 0303 123 1113 or by visiting the ICO website; https://ico.org.uk

Changes to this notice

This privacy notice may be updated from time to time, so you may wish to check it each time you submit information to Focus-Trust. The date of the most recent revisions will appear on this page. We may notify volunteers of any major changes by placing a notice on the website or by contacting you directly.

** Data Protection Requirements means the Data Protection Act 2018, the UK General Data Protection Regulation, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000 (SI 2000/2699), the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 and all other applicable laws and regulations relating to processing of personal data and privacy in any applicable jurisdiction as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner or such other relevant data protection authority.*

Volunteer acknowledgment

I have read and understood this privacy notice

Signed.....

Date……..