Privacy Notice for
Governance and Volunteers at
Olive Academies Independent School (OA-North View)

1. Introduction

Under UK data protection law, individuals have a right to be informed about how Olive Academies uses any personal data we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals working with the Independent School in a voluntary capacity, including proprietors.

Olive Academies Independent Schools (company number 16412383), whose registered office is Training & Development Centre, Inskip Drive, Hornchurch, RM11 3UR, is the data controller for the purposes of UK data protection law.

Our data protection officer is: Kuda Mika (see 'Contact us' below).

2. The personal data we hold

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

- Name
- Contact details
- Information relating to the visit, e.g. company or organisation name, arrival and departure time, car number plate
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required
- Photographs for identification purposes
- CCTV images captured in school.

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences. We may also hold data about you that we have received from other organisations, including other schools and social services.

3. Why we use this data

We use the data listed above to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing governor and volunteer's details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, Olive Academies may send you marketing information by email or text promoting OA events, campaigns, charitable causes or services that may be of interest to you.
You can withdraw consent or 'opt out' of receiving these texts and/or emails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication, or by contacting our data protection officer.

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

3.3 Use of your personal data for filtering and monitoring purposes

While you are in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

4. Our lawful basis for using this data

We only collect and use your personal data when UK data protection law allows us to. Most commonly, we process your general personal data under Article 6(1)(c) (Legal Obligation) to meet statutory education and safeguarding requirements, and Article 6(1)(e) (Public Task) to perform our official functions as an independent specialist school.

We only collect and use your personal data when the law allows us to. Most commonly, we process it because:

- **Public Task:** The processing is necessary for us to perform our official functions, maintain public safety, and meet statutory duties placed upon us.
- **Legal Obligation:** The processing is necessary for us to comply with a legal obligation (such as health and safety laws and safeguarding regulations).
- **Consent:** You have given us clear consent to use your personal data in a specific way (e.g., for marketing or specific voluntary access arrangements). You can withdraw this consent at any time.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

We collect personal information via application forms, emails and information we ask you on recruitment. While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. Whenever we seek to collect information from you, in order to comply with UK data [protection 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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Other schools or trusts

- The Department for Education

6. How we store this data

Personal data is stored in accordance with our data retention policy. We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with Olive Academies.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

When your relationship with Olive Academies has ended, we will retain and dispose of your personal information in accordance with our data retention policy.

7. Who we share this data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so. We may share information about members of the Proprietor Board and other volunteers with the Department for Education (DfE), Ofsted, the Independent Schools Inspectorate (ISI) and other regulatory bodies where required for regulatory, inspection, safeguarding, governance or legal purposes.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, Ofsted
- Suppliers and service providers:
- Our auditors
- Health authorities
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

7.1 Transferring data internationally

We may share personal information about you with international third parties such as security organisations, or other schools, where different data protection legislation applies. Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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 us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the UK data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

You have a statutory right to raise a data protection complaint directly with Olive Academies. If you believe we have processed your data unlawfully or infringed your rights, please contact our Data Protection Officer kuda.mika@oliveacademies.org.uk.

We will formally acknowledge your data protection complaint within five working days of receipt. We will thoroughly investigate the matter and provide you with a full response regarding our decision or the outcome of our investigation without undue delay, and at the latest within one calendar month.

If you remain dissatisfied with our internal response, or if you prefer to bypass this process, you retain your right to lodge a complaint with the UK supervisory authority, the Information Commissioner's Office (ICO).

- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns, or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

- **Data Protection Officer:** Kuda Mika
- **Email:** kuda.mika@oliveacademies.org.uk
- **Address:** Olive Academies Independent School, Training & Development Centre, Inskip Drive, Hornchurch, RM11 3UR