



## **PRIVACY NOTICE FOR AQUINAS ADVISORY COUNCIL MEMBERS AT Cudham CE Primary School (the Academy)**

### **PART OF THE AQUINAS CHURCH OF ENGLAND EDUCATION TRUST (The Trust)**

The Academy collects data and information about volunteers who support the Academy so that we can comply with our health and safety and safeguarding responsibilities. This privacy notice explains how and why we collect data from our volunteers, what we do with it and what rights you have in relation to the personal data and information collected.

#### **Privacy Notice (How we use your information)**

We are a Church of England secondary academy and part of the Trust, which is the data controller for the purposes of General Data Protection Regulation (GDPR). The Trust is a charitable company limited by guarantee under company number 07525735. The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ. For further information of the Trust please see [www.aquinastrust.org](http://www.aquinastrust.org).

Although you are an AAC member at the Academy, it is the Trust which is ultimately responsible for safeguarding and health and safety at the Academy. Consequently, the Trust acknowledges its obligations to you under the data protection legislation in relation to your personal data and is committed to the principles of data protection as detailed in the Trust's Data Protection Policy.

#### **Why do we collect and use your information?**

We collect and use your information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about you is sensitive personal data, we will only process it where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see the Trust's Data Protection Policy for a definition of sensitive personal data.

We use your data to support our statutory functions of running a school and in order to meet the Trust's responsibilities, in particular:

- a. for the protection and welfare of pupils and others in the Academy;
- b. for the safe and orderly running of the Academy.
- c. for the administration and business functions of the Academy.

#### **The categories of AAC member information that we collect, hold and share includes:**

- a. Personal information (such as name, address, email contact details, Business Interest Declarations for both members and their close relatives);
- b. Photographs taken for the academy website
- c. Recording of DBS numbers
- d. CCTV footage.

We collect information about you when you join the AAC and it is updated during your four-year membership as an AAC member at the Academy as and when new information is acquired or created. We may also ask you to review some of the personal information we hold to ensure that it is accurate.

### **Collecting information about AAC members**

Most of the information you provide to us on a voluntary basis. Where appropriate, we will ask you to consent to processing personal data where there is no other lawful basis for processing it. Where you have given consent for the processing of personal information for a specific purpose, you are entitled to withdraw consent at any time.

In addition, we also use CCTV cameras around the Academy's site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

### **Storing AAC data**

We hold personal data in accordance with the Trust's Document Management and Retention Policy.

A significant amount of personal data is stored electronically, for example, on our database. Some information may also be stored in hard copy format.

Data stored electronically will be saved within a hybrid solution across the Trust. On premises as part of a Local Area Network which is supported by either Atomwide, ATS or EIS and within the Microsoft Azure Cloud Platform. All Local Area Networks are appropriately backed up. Microsoft Azure Data Centres are located within the UK and Europe. The contracts with these providers contain the necessary provisions to ensure the security of personal data.

### **Who do we share your information with?**

From time to time, we may also need to share your information with other third parties including the following:

- The NHS and Public Health England as a part of the Test and Trace requirements associated with the COVID-19 pandemic. Please also see the Trust's additional notice regarding the processing of data to support the national response to the COVID-19 Pandemic
- NGA
- Disclosure and Barring Service.

Some of the above organisations may also be Data Controllers in their own right in which case we will be jointly controllers of your personal data and may be jointly liable in the event of any data breaches.

In the event that we share your personal data with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

### **Why we share your information**

We do not share information about you with anyone without consent unless the law allows us to do so.

### **Requesting access to your personal data**

Under data protection legislation, you have the right to request access to information we hold about you ("Subject Access Request"). To make a request for your personal data contact one of the following; although any written request for personal data will be treated as a Subject Access Request.:

The Trust's Data Protection Officer: Mary Capon by writing to her at Aquinas Trust, Magpie Hall Lane, Bromley BR2 8HZ or emailing her at [info@aquinatrust.org](mailto:info@aquinatrust.org) and inserting 'subject access request' in the subject box.

Subject to the section below, the legal timescales for us to respond to a Subject Access Request is one calendar month. As we have limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and to avoid sending a request during periods when the Academy is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

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
- claim compensation for damages caused by a breach of our data protection responsibilities.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by contacting the Trust's data protection officer Alternatively, you can contact directly the Information Commissioner's Office at <https://ico.org.uk/concerns/>

**Contact:**

If you have any queries regarding this notice or the use of your personal information, please contact:

- The Trust's data protection officer, Mary Capon, who can be contacted by writing to her at The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ, by emailing [info@aquinatrust.org](mailto:info@aquinatrust.org) or calling 0203949 7000.
- Alternatively, you can contact the head of school, Mr Finch or the Academy's data protection lead Mrs Stewart, [admin@cudham.bromley.sch.uk](mailto:admin@cudham.bromley.sch.uk), 01959 572673.